



10 November 2022

Project Manager
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6143
NEW ZEALAND

Email: submissions@foodstandards.gov.au

Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the *Call for submissions – Application A1252: Glucoamylase from GM Aspergillus niger (gene donor: Penicillium oxalicum) as a processing aid.*

Yours sincerely

Raewyn Bleakley
Chief Executive



**Call for submissions: Application A1252:
Glucoamylase from GM *Aspergillus niger*
(gene donor: *Penicillium oxalicum*) as a
processing aid**

**Submission by the New Zealand Food & Grocery
Council**

10 November 2022

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“**NZFGC**”) welcomes the opportunity to comment on the *Call for submissions – Application A1252: Glucoamylase from GM Aspergillus niger (gene donor: Penicillium oxalicum) as a processing aid*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

APPLICATION

3. Novozymes Australia Pty Ltd has applied to amend the Australia New Zealand Food Standards Code (the “**Food Standards Code**”) to permit the sale and use of a protein engineered variant of the glucoamylase enzyme from a new genetically modified (“**GM**”) strain of *Aspergillus niger* (“**A. niger**”), as a processing aid in starch processing and the production of distilled alcohol. Glucoamylases from a number of other GM sources are already permitted in the Food Standards Code.

COMMENTS

4. The function of glucoamylase is to convert starch to glucose. Glucose is a widely used ingredient in the manufacture of syrups, beverages, cereal-based products, and fruit and vegetable products. The processing aid being considered is for use in starch processing, the manufacture of bakery products and the production of potable alcohol.
5. FSANZ addressed health and safety concerns in its risk assessment noting that:
 - Glucoamylase produced using *A. niger* has a history of safe use in many countries and this particular product is approved for use in Denmark. It should be noted that within the EU only specific countries including Denmark require safety evaluations for enzymes used as processing aids before they can be used in food production
 - The production strain, *A. niger*, is non-toxicogenic and non-pathogenic and has been shown to be non-genotoxic
 - The final enzyme product is purified so that *A. niger* is no longer present
 - In any case, *A. niger* is a commonly used production strain for enzymes which are, as noted at the outset of this submission, already approved for use in the Food Standards Code. Glucoamylase from other sources has been used in food production for several decades
 - Glucose syrup used during fermentation may be sourced from wheat on occasion but it is highly unlikely that any wheat protein would be present in the final product due to the extensive processing of the product. FSANZ considers that if it is present in the final food it would be at less than 5ppb. Even so, because of the low usage of enzymes and the alcohol distillation process, wheat proteins would not be carried over into the distillate. This would remove the need for allergen labelling. By comparison, while the Food Standards Code exempts alcohol distilled from wheat from the requirement to declare wheat, a wheat declaration would be required if wheat protein was present in other brewed beverages such as brewed soft drinks.
6. In light of the risk assessment, and noting that one more glucoamylase on the market provides industry with more choice, NZFGC supports amendment to the Food Standards

Code as proposed by FSANZ to permit glucoamylase from GM *A. niger* to be used in the Australian and New Zealand food supply

7. We would like to think that sooner rather than later, the assessment and approval process for enzymes and other processing aids might be streamlined so as to reduce the need for repetitive assessment of very similar products.