

Comments from the Victorian Departments of Environment and Primary Industries and Health

Due date of submission – 15 July 2014

The Victorian Departments of Environment and Primary Industries and Health (the Departments) welcome the opportunity to provide comments on Application A1091.

Application A1091 seeks to amend the processing aid Standard to update the current entry for the enzyme carboxyl proteinase.

From the FSANZ assessment report it is understood that:

- A nomenclature change by the international Union of Biochemistry and Molecular Biology has superseded Carboxyl proteinase (3.4.23.6) and replaced it with twelve different enzyme numbers;
- This has resulted in the current listing for carboxyl proteinase (3.4.23.6) in the Australia New Zealand Food Standards Code, Standard 1.3.3 Table to Clause 17 being outdated;
- Only three of these twelve enzymes (Aspergillopepsin I 3.4.23.18, Aspergillopepsin II 3.4.23.19 and Mucorpepsin 3.4.23.23) can be sourced from currently permitted microorganisms;
- Mucorpepsin 3.4.23.23 is already listed in a separate entry in the Table to Clause 17;
- This nomenclature change will not result in broader permissions for use of these enzymes than the current position; and
- The applicant is seeking amendment to the Table to Clause 17 to ensure regulatory clarity around their permissions for use.

The Departments acknowledge that this nomenclature change will not require a safety assessment.

On this basis, the Departments support the progression of Application A1091.