

Comments from the Victorian Department of Health and the Victorian Department of Jobs, Precincts and Regions.

Due date of submission – 1 July 2022

The Victorian Departments of Health and Jobs, Precincts and Regions (the departments) welcome the opportunity to respond to this application to amend the Australia New Zealand Food Standards Code (the Code).

Application A1240 – *Polygalacturonase from GM Aspergillus oryzae as a processing aid* seeks to permit the use of the enzyme polygalacturonase derived from a genetically modified (GM) strain of *A. oryzae*.

From the Food Standards Australia New Zealand (FSANZ) Assessment report it is understood that:

- The draft variation prepared by FSANZ proposes to list polygalacturonase sourced from *A. oryzae* (containing the polygalacturonase gene from *A. tubingensis*) as a permitted processing aid in Schedule 18. For the manufacture and/or processing of fruit and vegetable juices/products, and in the production of coffee, flavouring substances and wine.
- Polygalacturonase is an enzyme that catalyses the hydrolysis of pectin during the processing of plant foods and does not perform a function in the final food for sale and meets the requirements of a processing aid under the Code.
- The proposed enzyme will be marketed as a proprietary blend containing polygalacturonase and pectinesterase to achieve complete pectin degradation.
- Polygalacturonase has a history of safe use and is already listed as a permitted processing aid in the Code from three different non-GM microbial sources, including *A. oryzae*.
- The risk assessment conducted by FSANZ determined that the GM host strain is neither toxigenic nor mutagenic, complies with purity specifications for food grade enzymes and does not exert any (unintentional) enzymatic activity in final food products.
- The genetic modification process involved gene insertion, which is stable and of low allergy risk.
- Foods for sale that contain polygalacturonase derived from GM *A. oryzae* as an ingredient will be subject to the GM labelling requirements under the Code. However, GM labelling requirements will not apply if the food containing the enzyme is not a food for sale itself (for example, if the enzyme is present in fruit juice that is used as an ingredient in a beverage product).
- The approval of the enzyme as a processing aid will enhance the competitiveness of Australia / New Zealand manufacturers of fruit, vegetable, and wine products in the international market, especially in Southeast Asia and the Middle East.

On the basis of the information above and FSANZ's conclusion that there are no public health and safety issues associated with polygalacturonase derived from GM *A. oryzae*, the departments support the progression of Application A1240.