

Project Officer Application A1206
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6036

26 January 2021

Tēnā koe,

Application A1206 – Subtilisin from GM *Bacillus licheniformis* as a processing aid (enzyme) - submission

Thank you for the opportunity to comment on this application. New Zealand Food Safety (NZFS) has the following comments to make:

NZFS supports amending Schedule 18– 9(3) to include the enzyme subtilisin (EC 3.4.21.62) produced from a genetically modified strain of *Bacillus licheniformis* (*B. licheniformis*) containing the subtilisin gene from *Pyrococcus furiosus*. Subtilisin is proposed as a processing aid for use in the production of potable alcohol, in an amount consistent Good Manufacturing Process (GMP).

We note FSANZ's assessment that based on the available evidence, there are no safety concerns from the proposed uses of subtilisin as a processing aid. *B. licheniformis* has a long history of safe use as a source microorganism of enzyme processing aids.

Further we note that food for retail sale or sold to a caterer that contains the enzyme subtilisin sourced from the GM strain *B. licheniformis* would be required to be labelled 'genetically modified' in conjunction with the name of the GM food, if novel DNA or novel protein from the GM strain of *B. licheniformis* remains in that food for sale.

Nāku noa, nā

[Redacted]

[Redacted]

New Zealand Food Safety – Haumaru Kai Aotearoa
Food Science & Risk Assessment Directorate