



27 January 2021

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 A1206: Subtilisin from GM Bacillus licheniformis as a processing aid (enzyme)*.

Yours sincerely

[Redacted signature block]

[Redacted contact information]



***Call for submissions: Application A1206:
Subtilisin from GM Bacillus licheniformis
as a processing aid (enzyme)***

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

27 January March 2021

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the *Call for submissions – Application A1206: Subtilisin from GM Bacillus licheniformis as a processing aid (enzyme)*.
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.

COMMENTS

3. Novozymes Australia Pty Ltd has made application for amendment to the Australia New Zealand Food Standards Code (the Food Standards Code) to include provision for subtilisin from a GM strain of *Bacillus licheniformis* (*B. Licheniformis*) as a processing aid in the production of alcohol. The function of subtilisin is to hydrolise proteins. *B. Licheniformis* has a long history of safe use as a source of enzyme processing aids including at least nine other processing aids already approved in the Food Standards Code.
4. FSANZ addressed health and safety concerns in its risk assessment noting that:
 - The production strain, *B. Licheniformis*, is non-toxic and non-pathogenic and has been shown to be non-genotoxic.
 - The final enzyme product is purified so that *B. Licheniformis* is no longer present.
 - In any case, *B. Licheniformis* is a commonly used production strain for enzymes which are already approved for use in the Food Standards Code.
 - No allergenic material is present in the enzyme preparation thereby removing the need for allergen labelling.
 - Subtilisin from other sources has been used in food production for several decades.
5. In light of the risk assessment and noting that a subtilisin provides industry with choice, NZFGC supports amendment to the Food Standards Code as proposed by FSANZ to permit subtilisin from a GM strain of *Bacillus licheniformis* (*B. Licheniformis*) as a processing aid to be used in the Australian and New Zealand food supply.