

5 September 2014

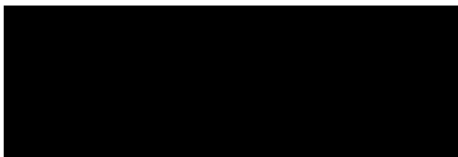
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for Submissions – Application A1096 Xylanase from Bacillus licheniformis as a Processing Aid (Enzyme)***.

Yours sincerely



Katherine Rich
Chief Executive

Food Standards Australia New Zealand
CALL FOR SUBMISSIONS – APPLICATION A1096
XYLANASE FROM *BACILLUS LICHENIFORMIS*
AS A PROCESSING AID (ENZYME)
5 September 2014

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to comment on the ***Call for Submissions – Application A1096 Xylanase from Bacillus licheniformis as a Processing Aid (Enzyme)***.

New Zealand Food & Grocery Council

The NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$28 billion in export revenue from exports to 185 countries – some 61% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages. Our members directly or indirectly employ 370,000 people, one in five of the workforce.

Comments

NZFGC understands this application has been made by a supplier of enzymes to the food industry. In this instance, the application is for an enzyme sourced from a genetically modified strain of *Bacillus licheniformis* for use in the baking industry.

There is already an enzyme approved in the Australia New Zealand Food Standards Code (the Food Standards Code) that is derived from *B. licheniformis*, Alpha-amylase. The assessment of Alpha-amylase referred to a 2004 evaluation of the enzyme by the WHO/FAO Joint Expert Committee on Food Additives (JECFA). The current assessment also refers to a JECFA evaluation.

NZFGC is aware that two regulatory agencies have assessed and agreed that the proposed enzyme is safe for use in baking (the Danish Veterinary and Food Administration and the US Food and Drug Administration) and that an application for approval for use is under consideration by two other regulatory agencies (the Brazilian National Health Surveillance Agency and Health Canada).

FSANZ has assessed the enzyme, endo-1,4- β -xylanase sourced from a genetically modified strain of *B. licheniformis*, as presenting no public health and safety issues on the basis of several considerations including that the production organism is not toxigenic, pathogenic or sporogenic, *B. licheniformis* has a history of safe use as the production organism for a number of enzyme processing aids that are already permitted in the Food Standards Code, the enzyme preparation is not genotoxic *in vitro* and the enzyme causes no observable effects at the highest tested doses in a 90-day toxicity study in rats.

Use of this enzyme in the baking industry is intended to improve production processes by facilitating dough handling and improving the characteristics of the final bread. NZFGC is supportive of industry efforts to improve food processing and manufacturing and in light of the foregoing, NZFGC supports the application. NZFGC therefore also supports the inclusion in the Food Standards Code of an entry in Standard 1.3.3 using new nomenclature proposed by FSANZ as 'endo-1,4-beta-xylanase (EC 3.2.1.8)'.