

29 March 2016

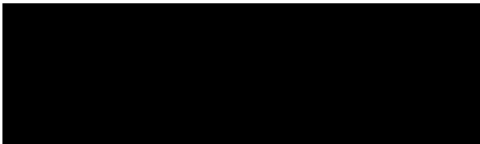
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for submissions – Application A1120 Agarose Ion Exchange Resin as a Processing Aid for Lactoferrin Production.***

Yours sincerely



Katherine Rich
Chief Executive

Food Standards Australia New Zealand
***CALL FOR SUBMISSIONS – APPLICATION A1120 – AGAROSE ION
EXCHANGE RESIN AS A PROCESSING AID FOR LACTOFERRIN
PRODUCTION***
29 March 2016

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to comment on the *Call for submissions – Application A1120 Agarose Ion Exchange Resin as a Processing Aid for Lactoferrin Production*.

New Zealand Food & Grocery Council

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 \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

The Application

This application is for the approval for a new processing aid, an Agarose ion exchange resin, which is intended for use for the production of high purity Lactoferrin from bovine milk. Lactoferrin has multiple physiological functions, and is one of the most important proteins present in mammalian milk primarily because of its role in iron metabolism and its protective role against a wide variety of infectious agents resulting in its consideration as part of the innate immune system. Lactoferrin has been produced commercially since 1986. The ion exchange resin used for assisting in the extraction of Lactoferrin requires certain specific characteristics. None of the permitted ion exchange resins currently listed in Standard 1.3.3 have all of these characteristics and are therefore not suitable for efficient commercial production of Lactoferrin.

Comments

NZFGC supports the FSANZ conclusion that the proposed use of the resin as a processing aid for Lactoferrin production presents no identifiable public health and safety concerns.

NZFGC also notes that the processing aid has been fully evaluated for safety for the intended purpose and is approved by the U.S. Food and Drug Administration as a Food Contact Substance. It complies with Codex Guidelines on Substances used as Processing Aids. In the EU, the processing aid meets the regulatory requirements for substances that come in contact with food, and the substances used for the manufacture of the Processing Aid are included on the “list of substances used in the manufacture of ion exchange and adsorbent resins”.