

**Comments from the Victorian Departments of Health and Human Services and Economic Development, Jobs, Transport and Resources**

**Due date of submission – 12 April 2018**

The Victorian Departments of Health and Human Services and Economic Development, Jobs, Transport and Resources (the departments) welcome the opportunity to provide comments on Application A1151 –  $\beta$ -Galactosidase from *Papiliotrema terrestris* as a Processing Aid (enzyme).

Application A1151 proposes to amend Schedule 18 of the *Australia New Zealand Food Standards Code* (the Code) to include  $\beta$ -Galactosidase derived from *Papiliotrema terrestris* as an enzyme of microbial origin.

From the FSANZ assessment report it is understood that:

- The purpose of the application is to permit the use of the enzyme  $\beta$ -Galactosidase as a processing aid for the production of galacto-oligosaccharide (GOS) from lactose.
- GOS can be used as an ingredient in various foods.
- The enzyme is sourced from a conventionally mutated strain of *P. terrestris* (strain AE-BLC). The strain is not genetically modified.
- $\beta$ -Galactosidase converts the lactose into primarily glucose and galactose. The released galactose reacts with saccharides to form GOS, which has primary commercial importance as a prebiotic.
- The  $\beta$ -galactosidase derived from *P. terrestris* (strain AE-BLC) has enhanced acid and temperature resistance. These properties make the enzyme more useful when compared with  $\beta$ -galactosidases derived from other sources.
- The use of the enzyme is technologically justified.
- Schedule 18 permits the use  $\beta$ -galactosidase as processing aid from several microbial sources including *Aspergillus niger*, *A. oryzae*, *Bacillus circulans* ATCC 31382, *Kluyveromyces marxianus* and *K. lactis*.
- $\beta$ -Galactosidase produced by a genetically modified (GM) strain of *Bacillus licheniformis* is also permitted in the Code.
- The use of  $\beta$ -galactosidase sourced from *P. terrestris* strain AE-BLC is not currently permitted for use in any country, however an application to seek permission has been lodged in Denmark and an application will be lodged in France. A Generally Recognised as Safe (GRAS) notification will also be prepared for use in the USA.
- FSANZ's risk assessment has concluded that there are no safety risks from the use of the enzyme as a processing aid.

On the basis of this understanding, the departments support the progression of the Application.