

Comments from the Victorian Department of Health and the Victorian Department of Jobs, Precincts and Regions.

Due date of submission – 13 September 2022

The Victorian Departments of Health and Jobs, Precincts and Regions (the departments) welcome the opportunity to respond to this application to amend the Australia New Zealand Food Standards Code (the Code).

Application A1224 – *Glucose oxidase from Penicillium rubens as a processing aid* seeks to permit the use of the enzyme glucose oxidase derived from the non-genetically modified fungus, *Penicillium rubens*.

From the Food Standards Australia New Zealand (FSANZ) Assessment report it is understood that:

- Glucose oxidase is an enzyme that catalyses the breakdown of glucose to reduce glucose content. This function has several technological purposes, including preventing non-enzymatic browning via the Maillard reaction, and strengthening protein complexes within wheat or starch-based foods.
- The enzyme does not perform a function in the final food for sale and meets the requirements of a processing aid under the Code.
- Glucose oxidase has a history of safe use, with several microbial sources of the enzyme already approved for use in the Code.
- The production organism (*P. rubens*) is non-pathogenic and has a history of safe use in a number of countries.
- A food allergen is used in the production of the enzyme during fermentation. However, analytical testing demonstrated the allergen was not detected in the manufactured ultra-filtered enzyme concentrate.
- The draft variation prepared by FSANZ proposes to list glucose oxidase (EC 1.1.3.4) sourced from *P. rubens* as a permitted processing aid in Schedule 18 for the manufacture of cooked products made from a dough (such as bread); pasta; noodles; and dried egg powder.

On the basis of the information above and FSANZ's conclusion that there are no public health and safety issues associated with glucose oxidase derived from *P. rubens*, the departments support the progression of Application A1224.