8 Sep 2022

Project Manager
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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 A1224: Glucose oxidase from Penicillium rubens as a processing aid.*

Yours sincerely

[redacted]

[redacted]

Call for Submissions – Application A1224: Glucose oxidase from Penicillium rubens *as a processing aid*

Submission by the New Zealand Food & Grocery Council

8 September 2022

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council ("NZFGC") welcomes the opportunity to comment on the *Call for Submissions – Application A1224: Glucose oxidase from Penicillium rubens as a processing aid.*

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. This Application is from Shin Nihon Chemical Co. Ltd for the use of the enzyme glucose oxidase sourced from a non-genetically modified *Penicillium rubens* (*P. rubens*). The enzyme as a processing aid would be used in the manufacture of cooked products made from a dough (such as bread); pasta; noodles; and dried egg powder.

4. Glucose oxidase as an enzymatic processing aid already been approved for use in the Food Standards Code in Schedule 18, section S18—4 Permitted enzymes, from two different sources which have both been subject to separate approvals:
    - Glucose oxidase from *Aspergillus oryzae*, containing the gene for glucose oxidase isolated from *Aspergillus niger*
    - Glucose oxidase from *Aspergillus niger*,

5. The current application would be the third source.

6. FSANZ addressed health and safety concerns in its risk assessment noting that:
    - Glucose oxidase produced sourced from a non-genetically modified *Penicillium rubens* (*P. rubens*) has a history of safe use and this particular product is approved for use in Japan and has GRAS status (with a no questions response) in the USA.
    - The production strain, *P. rubens*, is non-toxigenic and non-pathogenic and has been shown to be non-genotxic
    - The final enzyme product is purified so that *P. rubens* is no longer present.

7. FSANZ concluded there were no public health and safety concerns identified in the assessment of glucose oxidase from *P. rubens* under the proposed conditions of use.

8. Due to the voluntary nature of the proposed permission, businesses will use the enzyme, where they consider there is a net benefit for them to do so.

9. In light of the risk assessment and noting that this product provides industry with choice, NZFGC supports amendment to the Food Standards Code as proposed by FSANZ to permit Phosphilase from GM *A. niger* (donor *Evansstolkia leycettana*) to be used in the Australian and New Zealand food supply.