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

Due date of submission - 10 March 2021

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 A1210 – *Maltogenic alpha-amylase enzyme from GM <u>Saccharomyces cerevisiae</u> seeks to permit the use of the enzyme maltogenic alpha-amylase from a genetically modified (GM) strain of <i>S. cerevisiae*.

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

- Maltogenic alpha-amylase from the GM *S. cerevisiae* (the enzyme) is used in the manufacture of bakery products. The enzyme would not perform a function in these products at the point of sale, and therefore meets the requirements for use as a processing aid.
- The enzyme is derived from a GM strain of *S. cerevisiae* containing the maltogenic alpha-amylase gene from *Geobacillus stearothermophilus*.
- Both organisms, *S. cerevisiae* and *G. stearothermophilus*, have a history of safe use for the production of food enzymes.
- Currently, the Code permits maltogenic alpha-amylase derived from a GM strain of *Bacillus subtilis* to be used as a processing aid in the manufacture of all foods.
- The enzyme has received Generally Recognised as Safe (GRAS) approval for the production of baked foods from the US FDA. Applications to seek approval for the use of enzyme in the European Union and Canada are being assessed by the relevant authorities.

It is also understood that, as no genetically modified DNA or novel protein will remain in the food treated with the enzyme, there are no 'genetically modified' labelling requirements for use of this enzyme when used as a processing aid in the production of food.

On the basis of the information above and FSANZ's conclusion that there are no public health and safety issues associated with the use of maltogenic alpha-amylase from the GM $S.\ cerevisiae$ as a processing aid, the departments support the progression of Application A1210.