



Australian Government

Department of Agriculture, Fisheries and Forestry

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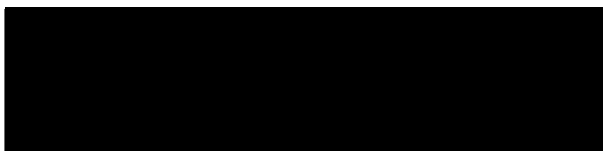
Re: BACTERIOPHAGE PREPARATION P100 AS A PROCESSING AID (A1045)


Dear Sir/Madam

The Australian Government Department of Agriculture, Fisheries and Forestry (DAFF) is pleased to provide comments on Application A1045 - Bacteriophage preparation P100 as a processing aid.

Thank you for providing DAFF the opportunity to comment on this application. Should you have any concerns regarding this submission, please contact me.

Yours sincerely




Acting Assistant Secretary
Food Branch

27 April 2012

DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY (DAFF)

**SUBMISSION TO FOOD STANDARDS AUSTRALIA NEW ZEALAND
(FSANZ)**

**APPLICATION - A1045 – BACTERIOPHAGE PREPARATION P100 AS A
PROCESSING AID**

This submission by the Department of Agriculture, Fisheries and Forestry (DAFF) is a response to the FSANZ 2nd call for submissions on Application A1045 - Bacteriophage preparation P100 as a processing aid (16 March 2012).

DAFF is the Commonwealth Department with responsibility for industries that span the food supply chain, from agricultural industries through to food processing. DAFF jointly shares responsibility with the Department of Health and Ageing (DoHA) for food policy for the Commonwealth Government.

Summary

DAFF supports the findings of the risk assessment for this Application which concluded that the use of the P100 preparation was completely characterised, technologically justified and safe for use on solid RTE foods as proposed by the Applicant.

After consideration of the costs and benefits of Application A1045, DAFF believes that the goals of consumers, industry and government can best be achieved by supporting Option 1, for FSANZ to progress a draft variation to clause 14 of Standard 1.3.3.

Specific Comments

The proposed drafting is complicated by creating a category for foods that are 'solid, and not wholly or partly covered in a liquid'.

Semi-solid foods were not evaluated in the risk assessment as no studies were available for assessment. There were also no studies to evaluate for solid foods wholly or partly covered in liquid, however this category has been created for the purpose of excluding it from the permission to use the processing aid.

This categorisation of foods to further restrict the potential use of a processing aid beyond the provisions in the definition of processing aids, raises a concern about creating a category of foods that are not well defined, for very limited application.

Enforcement of the proposed provision, particularly for imported foods, would be difficult, especially if seepage of liquid were to occur after treatment of a solid food.

There were no ongoing technological functions performed by the P100 preparation in solid RTE foods. This is concluded not to be the situation for liquid foods, although this possibility was not extensively evaluated. If the technological function of the

processing aid in final liquid or semi-solid foods can be stopped by further innovations then future approval requests for the process should be considered favourably.

The preferred approach in the second call for submissions is for P100 to be permitted as a processing aid for certain solid RTE foods, specifically meat (includes poultry) and meat products, cheese, fish and fish products, and fruits and vegetables and their products.

DAFF supports the conclusion of the risk assessment that P100 has no ongoing technological function in solid RTE foods and considers that the drafting should reflect this outcome (Option 1).

