

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

**Due date of submission – 31 July 2015**

The Victorian Departments of Economic Development, Jobs, Transport & Resources, and Health & Human Services (the departments) welcome the opportunity to provide comments on Application A1107.

Application A1107, submitted by Novozymes Australia Pty Ltd, seeks approval for asparaginase (the enzyme) isolated from a genetically modified (GM) strain of the bacterium *Bacillus subtilis*, to be used as a processing aid.

From the FSANZ assessment report it is understood that:

- The purpose of the enzyme is to reduce acrylamide formation in the production of foods such as breakfast cereals, potato crisps and coffee beans.
- Acrylamide is a public health and safety issue so any method to reduce its formation in foods is beneficial.
- The enzyme preparation complies with international specifications and is currently approved for use in the US, Denmark, Brazil and Mexico.
- *Bacillus subtilis* has a long history of safe use as a production strain for food grade enzymes.
- The strain is not present in the final enzyme preparation and the enzyme itself is identical to the asparaginase found in nature.
- There would be no GM labelling requirements for foods associated with the use of this enzyme as no novel DNA or protein would be present in those foods.
- If approved, FSANZ proposes amendment to the revised Code which comes into operation on 1 March 2016, but not to the current Code.

The departments acknowledge that no toxicity or allergenicity concerns were raised by FSANZ in its safety assessment of this Application.

On this basis, the departments support the progression of Application A1107.