

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

Due date of submission – 10 January 2020

The Victorian Departments of Health and Human Services 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).

Food Standards Australia New Zealand (FSANZ) has called for submissions in response to Application A1182 – Glucose oxidase from *Trichoderma reesei* as a processing aid (enzyme). The Application seeks permission to use glucose oxidase derived from a genetically modified strain of *T. reesei* as a processing aid.

From the FSANZ's assessment report it is understood that:

- Glucose oxidase from *T. reesei* (the enzyme) is proposed for use in the production of cereal-based products and in egg processing. The enzyme would not perform an ongoing function in these products and therefore meets the requirements of the Code for a processing aid.
- The enzyme is derived from a genetically modified strain of *T. reesei* containing the gene for glucose oxidase from *Penicillium amagasakiense*.
- The safety of *T. reesei* has previously been assessed by FSANZ and the Code currently permits several enzymes derived from this microorganism.
- The enzyme, glucose oxidase, is permitted for use in food production in the United States, France, Denmark, Mexico and Canada.

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

Further, as wheat flour and casein are used in the enzyme preparation process, it is understood that wheat will be present in final food products, but casein may remain but at levels below the limit of detection. It is expected that food products manufactured using this enzyme will need to be labelled for these allergens accordingly.

The departments acknowledge that no public health and safety concerns were raised by FSANZ in its risk assessment of this application. On this basis, the departments support the progression of Application A1182.