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

Due date of submission – 27 July 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).

Application A1194 – Glucoamylase from GM *Trichoderma reesei* as a PA (enzyme) seeks to permit the use of a glucoamylase enzyme preparation from a genetically modified (GM) strain of *Trichoderma reesei*.

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

- Glucoamylase from the GM *T. reesei* (the enzyme) is used in the manufacture of potable alcohol and bakery products, as well as in brewing and starch processing. 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 *T. reesei* containing the glucoamylase gene from a different strain of *T. reesei*.
- *T. reesei* has a long history of safe use in food enzyme production and the Code currently permits the use of several enzymes derived from the organism.
- The enzyme preparation is permitted for use in France and Denmark. The enzyme has received Generally Recognised as Safe (GRAS) approval in the United States and is permitted for use as a processing aid.
- No genetically modified DNA or novel protein will remain in the food treated with the enzyme. Therefore, 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 glucoamylase from *T. reesei* as a processing aid, the departments support the progression of Application A1194.