



8 Sep 2022

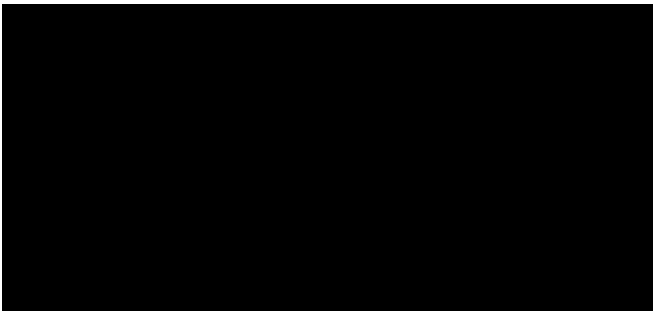
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the *Call for Submissions – Application A1221: Phospholipase A1 from GM Aspergillus niger as a processing aid.*

Yours sincerely





***Call for Submissions – Application A1221:
Phospholipase A1 from GM Aspergillus
niger as a processing aid***

**Submission by the New Zealand Food & Grocery
Council**

8 September 2022

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the *Call for Submissions – Application A1221: Phospholipase A1 from GM Aspergillus niger as a processing aid*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

COMMENTS

3. This Application is from Novozymes Australia Pty Ltd for the use of the enzyme phospholipase A1 from genetically modified (GM) *Aspergillus niger*, as a processing aid during the manufacture of certain foods. The proposed use of this enzyme is in the processing of vegetable oils, specifically the degumming (removal of phosphatides) of those oils, which can then be used in the manufacture of fat-based products.
4. Phospholipase as an enzymatic processing aid is already approved for use in Food Standards Code in Schedule 18, section S18—4 Permitted enzymes, from two different sources which have both been subject to separate approvals:
 - Phospholipase A1 from *Aspergillus oryzae*, containing the gene for phospholipase A1 isolated from *Fusarium venenatum*
 - Phospholipase A2 from *Aspergillus niger*, containing the gene isolated from porcine pancreas
5. The current application would be the third source.
6. FSANZ addressed health and safety concerns in its risk assessment noting that:
 - Phospholipase produced using *A. niger* has a history of safe use in many countries and this particular product is approved for use in Denmark, France, Brazil and Mexico.
 - The production strain, *A. niger*, is non-toxigenic and non-pathogenic and has been shown to be non-genotoxic
 - The final enzyme product is purified so that *A. niger* is no longer present
 - In any case, *A. niger* is a commonly used production strain for enzymes which are already approved for use in the Food Standards Code
7. The phospholipase A1 gene donor was named in the application as *Talaromyces leycettanus*. *Talaromyces leycettanus* has however, recently been reclassified to *Evansstolkia leycettana* (basionym *Talaromyces leycettanus*).
8. In light of the risk assessment and noting that this product provides industry with choice, NZFGC supports amendment to the Food Standards Code as proposed by FSANZ to permit Phospholipase from GM *A. niger* (donor *Evansstolkia leycettana*) to be used in the Australian and New Zealand food supply.