

**Comments from the Victorian Department of Health, the Victorian Department of Jobs, Precincts and Regions, and Dairy Food Safety Victoria.**

**Due date of submission – 12 May 2022**

The Victorian Departments of Health and Jobs, Precincts and Regions (the departments) and Dairy Food Safety Victoria (DFSV) welcome the opportunity to respond to this application to amend the Australia New Zealand Food Standards Code (the Code).

Application A1244 - *Chymosin from GM Trichoderma reesei as a processing aid* seeks to permit the use of the enzyme chymosin derived from a genetically modified (GM) strain of *T. reesei*.

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

- Chymosin from GM *T. reesei* is proposed to be used as an enzyme in the manufacture of cheese, cheese products, fermented milk products and renneted milk products. The enzyme would not perform a function in these products, and therefore meets the requirements of a processing aid.
- Chymosin has a history of safe use in the manufacture of dairy foods and there are currently three other sources of chymosin approved for use in the Code.
- The proposed chymosin is derived from a genetically modified strain of *T. reesei* containing the chymosin gene from the domestic cow (*Bos taurus*). Both the host organism (*T. reesei*) and the gene donor have a history of safe use in food production.
- Wheat is used as a source of glucose for fermentation during production of the enzyme. Any food for sale containing the enzyme where wheat is present will be subject to mandatory declaration requirements as outlined in *Standard 1.2.3 - Information requirements – warning statements, advisory statements and declarations*.
- Foods for sale that contain chymosin derived from GM *T. reesei* as an ingredient will be subject to the GM labelling requirements under the Code. However, GM labelling requirements will not apply if the food containing the enzyme is not a food for sale itself (for example, if the enzyme is an ingredient in a mixed food such as cheese powder on a biscuit).

On the basis of the information above and FSANZ's conclusion that there are no public health and safety issues associated with chymosin derived from GM *T. reesei*, the departments and DFSV support the progression of Application A1244.