

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

**Due date of submission – 29 June 2022**

The Victorian Departments of Health 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 A1246 – *Phospholipase A1 from GM Aspergillus oryzae* seeks to permit the use of the enzyme phospholipase A1 derived from a genetically modified (GM) strain of *A. oryzae*.

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

- Phospholipase A1 is an enzyme that hydrolyses phospholipids in the manufacture of bakery products to perform several technical functions, including improved dough strength, stability and structure. It does not perform a function in the final food for sale and meets the requirements of a processing aid under the Code.
- The proposed phospholipase A1 is derived from a genetically modified strain of *A. oryzae* containing the phospholipase A1 gene from *Valsaria rubricosa*.
- Phospholipase A1 (sourced from a GM strain of *A. oryzae* containing the phospholipase A1 gene from *Fusarium venenatum*) is already listed as a permitted processing aid in the Code.
- The risk assessment conducted by FSANZ determined that the GM host strain does not produce toxic metabolites, non-genotoxic, and that the genetic modification process which involved gene insertion is stable and non-allergenic.
- Phospholipase A1 preparations is proven to be used at minimum levels during food processing to achieve the desired effect according to the requirements of Good Manufacturing Practice (GMP).
- The enzyme is denatured during food processing hence negligible human exposure.
- Wheat flour is used in the preparation of the enzyme and the commercial product contains wheat and gluten. Any food for sale containing the enzyme will be subject to mandatory declaration requirements as outlined in Division 3 of Standard 1.2.3, including both wheat-based and wheat-free bakery products.
- Foods for sale that contain phospholipase A1 derived from GM *A. oryzae* 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 present in a bread crumb that is used as an ingredient in a crumbed meat product).
- The draft variation prepared by FSANZ proposes to list phospholipase A1 sourced from *A. oryzae* containing the phospholipase A1 gene from *V. rubricosa* as a permitted processing aid in Schedule 18 for use in the manufacture of bakery products.

On the basis of the information above and FSANZ's conclusion that there are no public health and safety issues associated with phospholipase A1 derived from GM *A. oryzae*, the departments support the progression of Application A1246.