

SUBMISSION FROM SA HEALTH

31 August 2017

Application A1131 Aqualysin 1 (Protease) as a Processing Aid (Enzyme)

SA Health welcomes the opportunity to provide comment on this application.

SA Health generally supports the application as the FSANZ safety assessment has concluded that there are no public health and safety concerns relating to permitting the enzyme but does question the requirement for labelling of a gluten free bakery product containing the enzyme carrier maltodextrin. Also, questions are raised about the proposed drafting for the enzyme permission.

Proposed drafting -

Schedule

[1] Schedule 18 is varied by adding the following to the table to subsection S18—9(3) in alphabetical order
Aqualysin 1 (EC 3.4.21.111) sourced from *Bacillus subtilis* containing the aqualysin 1 gene from *Thermus aquaticus*

For use in the manufacture of bakery products GMP

The drafting includes the term “bakery products”, This term is not defined in the Food Standards Code, in Standard 1.1.2 -Definitions used throughout the Code.

The proliferation of food terms that are not defined in Standard 1.1.2 make it difficult for interpretation and enforcement as to which foods the processing aid is permitted to be used in. It is important to maintain consistency in the terms used throughout the Code.

In Standard 1.1.2 the term “bakery products” is not defined. Although in the Code there is a Standard 2.1.1 Cereal and cereal products, but this does not define the term. The meaning of “bakery products” is not clear as to which foods are captured by the regulation. Dictionary definitions refer to a room with an oven or bakery where food is baked. Baked goods thus could be wider than just cereal products such as bread and biscuits, but include pizzas, pies, sausage rolls, and custards. The Food Technology report to A1131 discusses the use of the enzyme in the manufacture of bread and bakery products. Does the permission provided by the drafting exclude bread since it is considered a separate food category from bakery products in the food technology report?

Potential presence of allergens

The Food technology report to A1131 states “The carrier for the enzyme preparation is wheat-derived maltodextrin. The enzyme preparation will be added to flour used to produce bread and other baked products, therefore wheat or other cereals containing gluten will be the main ingredients in these baked goods. The presence of wheat or products derived from wheat such as maltodextrin could be of concern to people with wheat allergies or intolerances.”

It is understood that if the enzyme is used in gluten containing flours that this would be an addition to a product that already requires labelling for allergen presence.

As the carrier is maltodextrin which is a wheat derived allergen is there potential for the enzyme to be used in “gluten free” bakery products? Does the protease act on proteins in gluten free products to improve the dough or prevent staling? Does the protease act on non-gluten proteins? What would be the labelling requirement for a gluten free bakery product that uses the enzyme that has a maltodextrin as a carrier?