

SUBMISSION FROM SA HEALTH 2 November 2017

Application A1136 - Protein Glutaminase 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 the use of the enzyme, protein glutaminase sourced from *Chryseobacterium proteolyticum*, as a processing aid in the manufacture of certain food products.

However, some suggestions are provided to the proposed drafting for the purpose of clarity.

Proposed drafting –

Schedule

[1] **Schedule 18** is varied by inserting into the table to subsection S18—9(3) in alphabetical order Protein glutaminase (EC 3.5.1.44) sourced from *Chryseobacterium proteolyticum* strain AE-PG

To deamidate proteins during the manufacture and/or processing of the following types of food:

- (a) baked products;
- (b) pasta;
- (c) noodles;
- (d) milk;
- (e) other dairy products;
- (f) meat;
- (g) fish;
- (h) grains;
- (i) yeast; and
- (j) egg based products.

As the proposed maximum permitted level is GMP, for the processing aid it is proposed that the drafting be amended to permit the enzyme in food in general where it performs a technological function. There is no public health and safety issue. The list of types of foods in the drafting already covers a wide range of foods but still is restrictive to innovation if the food product does not meet the definition of the types of food listed.

The drafting includes the terms “bakery products”, “other dairy products”, “grains” “yeast”, “pasta” “noodles” and “egg based products”. These terms are 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. The approval process for the processing aid should generally permit its use in food where it performs a technological function. If there is a safety concern, then FSANZ should consider which foods to restrict use to, so as to limit its use in the food supply.

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.

In Standard 1.1.2 the term “other dairy products” is not defined. Although in the Code there is a PART 2.5 Dairy products, but this does not define the term. The meaning of “dairy products” is not clear as to which foods are captured by the regulation.