

2 November 2017

Project Manager
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6143
NEW ZEALAND

Email: submissions@foodstandards.gov.au

Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the *Call for submissions – Application A1136 Protein Glutaminase as a Processing Aid (Enzyme)*.

Yours sincerely

Katherine Rich
Chief Executive



***Call for submissions – Application A1136
Protein Glutaminase as a Processing Aid
(Enzyme)***

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

2 November 2017

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the **Call for submissions – Application A1136 Protein Glutaminase as a Processing Aid (Enzyme)**.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

COMMENTS

3. Amano Enzyme Inc (Nagoya, Japan) applied for permission in the Australia New Zealand Food Standards Code (the Food Standards Code) for a processing aid, protein glutaminase from *Chryseobacterium proteolyticum* strain AE-PG in late 2016. Amano considers that the processing aid can improve protein functionality in food. This parallels the use of a number of commercial methods available to improve the protein functionality of certain food products.
4. The Amano protein glutaminase is a processing aid that enhances protein solubility in a broad range of food areas such as baking, pasta/noodle making, milk, dairy meat, fish, grain processing, yeast products and egg based products. Solubility is the stand-out improvement attributed to the use of the processing aid. More formally, Amano identified the technological purpose as improving emulsification, foam stabilisation and gelling in protein related foods.
5. FSANZ has approved similar food enzymes in the past including Transglutaminase (EC 2.3.2.13) and Glutaminase (EC 3.5.1.2). Amano Enzyme's protein-glutaminase product has also been approved and marketed in several other major jurisdictions for food uses that are similar to those proposed for Australia/New Zealand.
6. In this instance, however, NZFGC understands the strain is particularly important because the species *C. proteolyticum* is not yet an approved bacterial name and has not been recommended by EFSA for inclusion on the list of EU microorganisms with a ‘Qualified Presumption of Safety’ due to an insufficient body of evidence at the species level. The safety data submitted by Amano in support of the application was specific to the protein glutaminase sourced from one particular non GM strain of *C. proteolyticum*.
7. The safety assessment of the processing aid identified that:
 - *C. proteolyticum* strain AE-PG was not pathogenic or toxigenic
 - the processing aid was not genotoxic *in vitro*
 - the no observed adverse effect level (NOAEL) testing suggested there was more than 200-fold safety buffer between the Applicant’s estimate of an individual’s theoretical maximal daily intake and the proposed uses; and
 - the processing aid does not present as a potential food allergen.
8. The FSANZ risk assessment concluded that there were no public health and safety issues associated with the use the applicant’s processing aid.

-
9. FSANZ also agreed that the use proposed was technologically justified at a maximum permitted level of GMP.
 10. Ensuring a wide variety of processing aids are available to food manufacturers is vital to the continuing evolution, refinement and improvement of food processing.
 11. NZFGC is therefore pleased to support the draft variation prepared by FSANZ that will permit the use of protein glutaminase sourced from *Chryseobacterium proteolyticum* strain AE-PG as a processing aid.