

HEALTH PROTECTION DIRECTORATE

Enquiries to: Gary Bielby
Principal Environmental Health
Officer, Food Safety Policy and
Regulation Unit,
Environmental Health Branch
Telephone: 07 3328 9324
Facsimile: 07 3328 9354
Email: gary_bielby@health.qld.gov.au
File Number: QCHO/2881 part 1
Our Ref.: GB110032

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Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

Dear Sir / Madam

Submission – Application A1050 – Acyltransferase from *Bacillus licheniformis* as a Processing Aid (Enzyme)

Thank you for the opportunity to provide a submission on the Assessment Report (AR) for Application A1050.

Queensland Government overview of genetically modified (GM) food

The Queensland Government is supportive of the move towards legislation that deals with genetically modified (GM) organisms. The Government considers it important that advances in science and technology are not impeded if it is shown that these advances do not harm human health or the environment.

With respect to the commercial production of GM crops, the Queensland Government has not imposed a moratorium and has developed a policy framework for coexistence of GM and non-GM crops, with the use of GM crops considered on a case by case basis.

The use of GM food is also considered on a case by case basis, with particular consideration and relevance to human health.

Role of Queensland Health

This is a whole of Queensland Government response and is made by Queensland Health since it is the lead agency in Queensland which coordinates policy advice relative to the national policy on food regulation. Our approach follows consultation with other relevant Queensland Government agencies.

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Office
Level 1, 15 Butterfield Street
Herston QLD 4006

Postal
PO Box 2368
Fortitude Valley BC QLD 4006

Phone
(07) 3328 9324

Fax
(07) 3328 9354

Issues relative to this Application

Although other relevant Queensland Government agencies have not indicated they have any issues relative to this Application, Queensland Health has identified a number of matters and concerns and would appreciate if these could be considered.

It is noted only a small amount of information is given on a kit-based method for determining acyltransferase enzyme activity. However, it seems this method would measure the total acyltransferase activity, not that specifically from this genetically modified source.

Queensland Health would appreciate further advice on this issue being provided to jurisdictions which would be responsible for monitoring and enforcing any amendment to the Food Standards Code in this regard.

In the Executive Summary (page ii) of the Assessment Report we note, *“To date, there has been no evaluation of acyltransferase from genetically modified (GM) B. licheniformis by the Joint FAO/WHO Expert Committee on Food Additives and Contaminants (JECFA). A ‘no-objections’ letter was received by the Applicant in response to a self-GRAS (generally recognized as safe) assessment (GRAS Notice 265) for the enzyme in the United States and it is currently under review in Brazil”*. As there has been no JECFA evaluation and no overseas approval granted to date, a degree of caution is warranted.

Therefore the progress of the application under review in Brazil and the anticipated timeline for the determination relative to this application is important information and Queensland Health would appreciate advice on this.

We would also appreciate the advice provided by FSANZ to the Office of Best Practice Regulation relative to the assessment of this Application in order to understand how the result of the benefit-cost analysis was reached, given it is noted that limited detail is presented.

In addition it is noted on page 8 of the AR that, *“There is not predicted to be any significant cost impost on jurisdictions to determine compliance with the proposed amendment compared with current monitoring and compliance activities”*. Advice would be appreciated how this conclusion was reached in light of the benefit-cost analysis, given this Application would result in an amendment / addition to the Food Standards Code.

Yours sincerely

Gary Bielby
Principal Environmental Health Officer
Food Safety Policy and Regulation Unit
Environmental Health Branch