



13 December 2011

Project Officer Application A1061
Food Standards Australia New Zealand
PO Box 10559
The Terrace
WELLINGTON 6036

FS350-117-1061

Dear Sir/Madam

Application A1061 – Amylomaltase as a Processing Aid (Enzyme) – Assessment Report

Thank you for the opportunity to comment on this application. The Ministry of Agriculture and Forestry (MAF) has the following comments to make.

We agree that the proposed use of amylomaltase is technologically justified.

MAF has had the genetic modification aspects of the FSANZ report reviewed by the Institute of Environmental Science and Research Limited (ESR). ESR note, and MAF agrees, that one issue that might be relevant is the potential for plasmid DNA, in particular the antibiotic resistance genes, to be present in the enzyme preparation after the downstream processing, and potentially enter the food chain. The Dossier reports that during the production process the amylomaltase is added to a suspension of potato starch. After the desired viscosity of the starch solution is achieved the solution is processed by a jet-cooker at 120°C to inactivate the enzyme. Finally the starch solution is spray-dried. This is claimed to ensure that no active enzyme is present in the final food. ESR and MAF assume that this process will also destroy any residual plasmid DNA in the preparation.

The Dossier claims that “As can be seen in the 3 Certificates of Analysis given in Annex II.A.5-1, the amylomaltase preparations do not contain antibiotic activity”. ESR and MAF are unclear what this refers to, as our examination of Annex II.A.5-1 did not find this result.

Subject to the clarification of the point, MAF supports Option 2, that is to prepare a draft variation to Standard 1.3.3 – Processing Aids, to permit the use of amylomaltase sourced from GM *Bacillus amyloliquefaciens* containing the gene for amylomaltase from *Thermus thermophilus* as a processing aid (enzyme).

Yours sincerely

Manager Food Safety



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