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17 September 2013

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

Dear Sir / Madam

**Submission – A1077 – Fungal Chitosan as a Processing Aid**

Thank you for the opportunity to provide a submission on the call for submissions regarding A1077 fungal chitosan as a processing aid.

This submission provides technical advice and comments related to this issue. It was prepared with the advice of officers from other relevant Queensland Government agencies. The submission does not represent a Queensland Government position, which will be a matter for the Queensland Government when notification is made by the FSANZ Board to the Legislative and Governance Forum on Food Regulation.

The Call for Submissions report states that "*Chitosan is insoluble in alcoholic beverages. The precipitates it forms with unwanted components during processing are removed via filtration or similar processes. Therefore, there is no requirement for analytical methods to check or quantify for chitosan residues remaining in treated alcoholic beverages.*" It appears the assumption has been made that alcoholic beverages in which it is used will always be completely filtered and that production failures will never occur. The Supporting Document mentions on several occasions that there is a method (based on HPLC) that can detect chitosan down to 10 mg/kg. There seems no reason why the details of this, or a reference to the method, could not be given so that jurisdictions could assess the suitability of the method and be able to locate the method should they need to check residual chitosan levels.

The aspect of potential allergenicity of proteins from *A. niger* is dealt with in section 3.5.7 of the Supporting Document. This states "However, residual levels of *A. niger* proteins in products derived using fungal chitosan as a processing aid would be expected to be extremely low." It would have been desirable if some concrete evidence to back up this statement had been provided.

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While the allergenic potential of residual levels of *A. niger* proteins has been considered, no information has been provided on whether chitosan itself could cause hypersensitivity or other adverse reactions in some individuals. As a result, it is not clear if FSANZ has considered whether an amendment of Standard 1.2.3 *Mandatory Warnings and Advisory Statements and Declarations* is required or not, which is important considering processing aids do not have to be declared on labels.

Should you require further information in relation to this matter, please contact Food Safety Standards and Regulation, Department of Health on (07) 3328 9310 or at [foodsafety@health.qld.gov.au](mailto:foodsafety@health.qld.gov.au)

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