

1 November 2016

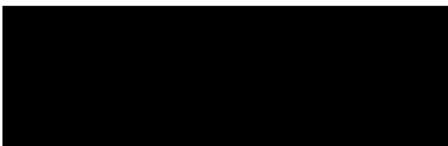
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for submissions – Application A1121: Oryzin (Protease) from Aspergillus melleus as a Processing Aid (Enzyme).***

Yours sincerely

A black rectangular box redacting the signature of Katherine Rich.

Katherine Rich  
**Chief Executive**



**Call for submissions – Application A1121:  
Oryzin (Protease) from *Aspergillus melleus*  
as a Processing Aid (Enzyme)**

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

**2 November 2016**

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## NEW ZEALAND FOOD & GROCERY COUNCIL

The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the **Call for submissions – Application A1121: Oryzin (Protease) from *Aspergillus melleus* as a Processing Aid (Enzyme)**.

1. 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.

### OVERARCHING COMMENTS

2. NZFGC notes that there are over 50 enzymes listed in the Food Standards Code as being derived from *Aspergillus* (mainly *Aspergillus niger* and *Aspergillus oryzae* – see Schedule 18--4(5)) but none from *Aspergillus melleus*.
3. The enzyme that is the subject of the current application, Oryzin (Protease), is listed by Codex and is approved in France, Denmark, China, Canada and Japan.
4. FSANZ did not identify any public health and safety issues with the use of the enzyme and NZFGC therefore supports the listing of the enzyme (Oryzin (Protease)) as proposed noting allergen labelling may be required on products made using the enzyme.

### SPECIFIC COMMENTS

#### **Application**

5. FSANZ states that the Application seeks to amend Schedule 18 in the *Australia New Zealand Food Standards Code* (the Food Standards Code) to permit the use of a new enzyme, Oryzin (Protease) from *Aspergillus melleus*, as a processing aid. The processing aid is intended for use in baking, dairy processing, egg, meat, fish and yeast processing, protein processing and flavouring production.
6. Using Oryzin would result in an enzymatic conversion of substrate proteins and peptides in a range of raw food materials intended to improve a range of properties including organoleptic, physiological and nutritional.

#### **Current Standard**

7. Processing aids permitted for addition to food are listed in Schedule 18. Schedule 18--4(5) lists permitted enzymes of microbial origin. There are 30 enzymes derived from *Aspergillus niger* and 24 from *Aspergillus oryzae* but none from *Aspergillus melleus*.

#### **Risk Assessment**

8. FSANZ reports that Oryzin (Protease) is listed by Codex and is approved in France, Denmark, China, Canada and Japan.
9. FSANZ did not identify any public health and safety issues with the use of the enzyme in terms of toxicity and genotoxicity (evidenced also by its history of safe use internationally). No Acceptable Daily Intake is proposed (since no hazard was identified in the toxicology data) and the substance is proposed for listing in the Food Standards Code

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**Conclusion**

10. NZFGC supports the listing of the enzyme (Oryzin (Protease)) as proposed.
11. NZFGC notes that soybean and wheat products are used in the fermentation medium in the production of Oryzin (Protease) and that soybeans and cereals containing gluten are required to be declared as an allergen statement if present in a food for sale, including when present as a processing aid. Products made using Oryzin (Protease) would likely require labelling to reflect this.