

28 March 2018

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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on ***Call for Submissions – Application A1151 – β -Galactosidase from Papilioterma terrestris as a processing aid (enzyme).***



***Call for Submissions – Application A1151 –
 β -Galactosidase from *Papilioterma*
terrestris as a processing aid (enzyme)***

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

28 March 2018

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on ***Call for Submissions – Application A1151 – β -Galactosidase from *Papilioterma terrestris* 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.

THE APPLICATION

3. Amano Enzymes from Japan has applied for an amendment to Schedule 18 of the *Australia New Zealand Food Standards Code* (the Food Standards Code) to allow an enzyme obtained from *Papilioterma terrestris* for the production of galacto-oligosaccharides (GOS) from lactose. GOS is used as an ingredient in the manufacture and/or processing of a wide variety of foods including baked goods and a range of dairy foods. A processing aid performs a technological purpose during processing/manufacture but does not remain or appear in the final food.

OVERARCHING COMMENTS

4. NZFGC supports the amendment to Schedule 18 of the Food Standards Code that would see β -Galactosidase from *Papilioterma terrestris* approved for use as a processing aid. This is based on the food technology and safety assessments conducted by FSANZ and the FSANZ conclusion that the enzyme provides and there were no public health and safety concerns associated with the substance’s use.
5. We note that there is another unrelated application for a processing aid in the same group – ‘enzyme’ – that was due for submission on 29 March 2018. NZFGC strongly supports all actions and measures to group processing aid and food additive applications into a regular, streamlined application, assessment and approval process.

DETAILED COMMENTS

Assessment by FSANZ

6. ***Food Technology assessment*** – FSANZ assesses the identity and purity of all additives and processing aids intended for use in the food supply. In this case, the substance is β -Galactosidase. FSANZ verified its identity with the International Union of Biochemistry and Molecular Biology (IUBMB). IUBMB material is compiled at the University of London and makes recommendations on biochemical and organic nomenclature, symbols and terminology drawing on the expertise of global experts in the relevant field. There is also an EINECS (European INventory of Existing Commercial chemical Substances) number for the substance further verifying its description in the Application.
7. FSANZ also considers product specification, technological purpose and use levels of the processing aid. The IUBMB and EINECS number information also contains product specification information and this aligns with the Application. The technological purpose is to aid the production of GOS from lactose. This particular enzyme has enhanced acid and temperature resistance. It therefore remains functional at higher temperatures and is therefore more useful than other β -Galactosidases. The amount used is the lowest

possible level to provide for the technological purpose (consistent with GMP – Good Manufacturing Practice).

8. FSANZ's conclusion is that the enzyme aids the production of GOS from lactose and is therefore technologically justified in the form and quantity proposed for use.
9. **Hazard Assessment** – FSANZ assesses the hazards of the production organism *Papilioterma terrestris* (*P. terrestris*) in terms of production of the substance and the overall safety of the processing aid.
10. FSANZ reports that β -Galactosidase from *Papilioterma terrestris* presents no public health or safety concerns: it is not infectious, pathogenic or genotoxic and non-toxicogenic and non-allergenic.
11. **NZFGC Conclusion** – On the basis of the foregoing, NZFGC supports the amendment to Schedule 18 of the Food Standards Code that would see β -Galactosidase from *Papilioterma terrestris* approved for use as a processing aid.