

SUBMISSION FROM SA HEALTH

29 March 2018

Application A1153 Endo-1,4- β -xylanase from *Trichoderma reesei* as a processing aid (enzyme)

SA Health welcomes the opportunity to provide comment on this application. SA Health generally supports the application as the FSANZ safety assessment has concluded that there are no public health and safety concerns associated with using endo-1,4- β -xylanase as a processing aid (enzyme). However, some suggestions are provided to the proposed drafting for the purpose of clarity.

Proposed drafting –

Name

This instrument is the *Food Standards (Application A1153 – Endo xylanase from Trichoderma reesei as a Processing Aid) Variation*.

2 Variation to a standard in the Australia New Zealand Food Standards Code

The Schedule varies a Standard in the *Australia New Zealand Food Standards Code*.

3 Commencement

The variation commences on the date of gazettal.

Schedule

[1] Schedule 18 is varied by inserting in the table to subsection S18—9(3), in alphabetical order

Endo-1,4- β -xylanase, protein engineered variant, (EC 3.2.1.8) from <i>Trichoderma reesei</i> , containing the gene for endo-1,4- β -xylanase isolated from <i>Thermopolyspora flexuosa</i>	For depolymerisation of arabinoxylans during the manufacture and/or processing of the following types of food:	GMP
	(a) bakery products;	
	(b) cereal products;	
	(c) grain;	
	(d) cereal based beverages (including beer); and	
	(e) potable alcohol	

As the proposed maximum permitted level is GMP, for the processing aid it is proposed that the drafting be amended to permit the enzyme in food in general where it performs a technological function. There is no public health and safety issue.

The drafting includes the terms “bakery products”, “cereal products”, “grains”, “cereal based beverages”, and “potable alcohol”. These terms are not defined in the Food Standards Code, in Standard 1.1.2 -Definitions used throughout the Code.

The proliferation of food terms that are not defined in Standard 1.1.2 make it difficult for interpretation and enforcement as to which foods the processing aid is permitted

to be used in. It is important to maintain consistency in the terms used throughout the Code. The approval process for the processing aid should generally permit its use in food where it performs a technological function. If there is a safety concern, then FSANZ should consider which foods to restrict use to, so as to limit its use in the food supply. The Processing aid standard in general should be reviewed in the future to improve the overall drafting of this standard.

In Standard 1.1.2 the term “bakery products” is not defined. Although in the Code there is a Standard 2.1.1 Cereal and cereal products, but this does not define the term. The meaning of “bakery products” is not clear as to which foods are captured by the standard. Dictionary definitions refer to a room with an oven or bakery where food is baked. Baked goods thus could be wider than just cereal products such as bread and biscuits, but include pizzas, pies, sausage rolls, and custards.

The Food Technology report provides The Table 2 Recommended use levels for endo-1,4- β -xylanase enzyme preparations, which provides a list of food applications and the raw material the enzyme preparation is applied to produce a final food. The proposed drafting in the assessment report appears to be a list of final foods, although it is unclear whether “potable alcohol” is a food. The enzyme does not provide a technological function to the final food, so providing permissions for a list of final foods is not appropriate. As the enzyme preparation is applied to the raw material of cereals (which includes flour) the drafting could be simplified by replacing the list of foods (a) to (e) with “cereal and cereal products”.