

Comments from the Victorian Department of Health and Human Services and the Victorian Department of Jobs, Precincts and Regions.

Due date of submission – 18 July 2019

The Victorian Departments of Health and Human Services and Jobs, Precincts and Regions (the departments) welcome the opportunity to respond to this application to amend the Australia New Zealand Food Standards Code (the Code).

Food Standards Australia New Zealand (FSANZ) has called for submissions to Application A1164 - Pullulanase from *Bacillus licheniformis* as a processing aid. The Application seeks permission to use pullulanase derived from a genetically modified bacterial strain, *B. licheniformis* BMP139, as a processing aid in brewing and starch processing.

From the FSANZ's assessment report it is understood that:

- Pullulanase from *B. licheniformis* (the enzyme) is involved in the conversion of pullulan and amylopectin in starch-containing raw materials to oligosaccharides and glucose. The enzyme would not perform a function in these products at the point of sale, and therefore meets the requirements to be used as a processing aid.
- The enzyme is derived from a genetically modified strain of *B. licheniformis*, BMP139, containing the pullulanase gene from another *Bacillus* species, *B. deramificans*.
- The safety of *B. licheniformis* BMP139 has previously been assessed by FSANZ and the Code permits several enzymes derived from the genetically modified organism.
- The enzyme is already permitted for use as processing aid in France, Denmark, Japan and the United States.
- Where novel DNA or novel protein remains in the food treated with the enzyme, these foods will need to comply with the labelling requirements of the Code and be labelled as 'genetically modified'.
- FSANZ has concluded that there are no public health and safety issues associated with the use of the enzyme as a processing aid.

On the basis of the information above, the departments support the progression of Application A1164.