



24 March 2020

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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 A1184: Glucoamylase from GM Aspergillus niger (donor Trametes cingulate)*.

Yours sincerely



***Call for submissions: Application A1184
Glucoamylase from GM Aspergillus niger
(donor Trametes cingulate)***

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

24 March 2020

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the *Call for submissions – Application A1184: Glucoamylase from GM Aspergillus niger (donor Trametes cingulate)*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

COMMENTS

3. This Application is a similar to one from the same company in 2019 (Application 1168) in that it is to produce glucoamylase from a by product of a genetically modified strain of the ubiquitous fungus *Aspergillus Niger* as the production strain.
4. The function of glucoamylase is to convert starch to glucose. Glucose is a widely used ingredient in the manufacture of syrups, beverages, cereal-based products, and fruit and vegetable products.
5. FSANZ addressed health and safety concerns in its risk assessment noting that:
 - Glucoamylase produced using *A. niger* has a history of safe use in many countries and this particular product is approved for use in Denmark and France.
 - The production strain, *A. niger*, is non-toxicogenic and non-pathogenic and has been shown to be non-genotoxic
 - The final enzyme product is purified so that *A. niger* is no longer present
 - In any case, *A. niger* is a commonly used production strain for enzymes which are already approved for use in the Food Standards Code
 - Soy and possibly wheat are used in the fermentation medium but are not likely to be in the final enzyme product due to washing and filtration of the product thereby removing the need for allergen labelling
 - Glucoamylase from other sources has been used in food production for several decades
6. In light of the risk assessment and noting that another glucoamylase on the market provides industry with choice, NZFGC supports amendment to the Food Standards Code as proposed by FSANZ to permit glucoamylase from GM *A. niger (donor Trametes cingulate)* to be used in the Australian and New Zealand food supply.
7. We note the draft amendment to Schedule 18 refers to an insertion in the Schedule to subsection S18—9(3) to add “Glucoamylase (EC 3.2.1.3) sourced from *Aspergillus niger* containing the glucoamylase gene from *Trametea cingulate*”. We would have expected the amendment to the Food Standards Code to have also included an amendment to Schedule 18, subsection 18—4 Permitted enzymes to provide an entry for this enzyme along the lines of: *Aspergillus niger* containing the gene for glucoamylase isolated from *Trametea cingulate*.