



4 June 2021

Project Manager
Food Standards Australia New Zealand
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Email: submissions@foodstandards.gov.au

Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the *Call for submissions – Application A1218: β -Galactosidase from Bacillus subtilis (Enzyme)*.

Yours sincerely

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**Call for submissions – Application A1218:
 β -Galactosidase from *Bacillus subtilis*
(Enzyme).**

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

4 June 2021

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the *Call for submissions – Application A1218: β -Galactosidase from Bacillus subtilis (Enzyme)*.
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. Danisco NZ (Ltd) made this application to FSANZ to permit β -Galactosidase from *Bacillus subtilis* for use as a processing aid in the production of lactose reduced dairy products.
4. There have been at least two previous recent applications for β -Galactosidase from different sources:
 - A1135 β -galactosidase from the genetically modified strain of *Bacillus licheniformis* as a processing aid (March 2017) and
 - A1151 β -Galactosidase from *Papilioterma terrestris* as a processing aid (28 March 2018).
5. Both were recommended for inclusion in the Food Standards Code. This was based on the food technology and safety assessments conducted by FSANZ and the FSANZ conclusions that the enzymes aid the production of substances from lactose and there were no public health and safety concerns associated with the substances’ use.
6. This application is no different. The food processing aid that is the subject to Application A1218 known as β -galactosidase from the genetically modified strain of *Bacillus subtilis* has been recommended for inclusion in the Food Standards Code
 - FSANZ’s technological and risk assessments of the β -galactosidase from *Bacillus subtilis* did not identify any issues of concern: it is not infectious, pathogenic or genotoxic and non-toxic and non-allergenic
 - The enzyme has been approved for use in France and Denmark and has GRAS status in the US.
7. NZFGC considers that β -galactosidase from *Bacillus subtilis* will add choice to the manufacture of milk products such as milk, yoghurt, cream and ice cream for the benefit of New Zealand consumers. NZFGC therefore supports amendment to the Food Standards Code to permit this enzyme to be used in New Zealand and Australia.