8 Sep 2022

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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 A1220: Beta-amylase from GM Bacillus licheniformis as a processing aid.*

Yours sincerely

[redacted]

[redacted]

Call for Submissions – Application A1220: Beta-amylase from GM *Bacillus licheniformis* as a processing aid

Submission by the New Zealand Food & Grocery Council

8 September 2022

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council ("NZFGC") welcomes the opportunity to comment on the *Call for Submissions – Application A1220: Beta-amylase from GM* Bacillus licheniformis *as a processing aid.*

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 similar to one from the same company, from Novozymes Australia Pty Ltd, assessed in March 2022 (Application A1185) which, in that case, was to produce Alpha-amylase from a genetically modified strain of *Aspergillus niger* as a processing aid.

4. The current application for Beta-amylase from GM *Bacillus licheniformis* is intended for use as a processing aid in starch processing to manufacture maltose syrup. Maltose syrup is used as a substitute for normal glucose syrup in the production of hard confectionary.

5. FSANZ addressed health and safety concerns in its risk assessment noting that:
   - Beta-amylase produced using *B. licheniformis* has a history of safe use in a number of countries and this particular product is approved for use in Denmark, France, Brazil and Mexico..
   - The production strain, *B. licheniformis*, is non-toxigenic and non-pathogenic and has been shown to be non-genotxic
   - The final enzyme product is purified so that *B. licheniformis* is no longer present
   - In any case, *B. licheniformis* is a commonly used production strain for enzymes which are already approved for use in the Food Standards Code.

6. In conclusion, FSANZ did not identify any public health or safety concerns in the assessment of beta-amylase from GM *B. licheniformis* under the proposed conditions of use.

7. In light of the risk assessment and noting that other beta-amylase products from other sources are already on the market, this product would provide industry with further choice. The proposed permission is for voluntary use and businesses will use beta-amylase from this additional source, GM *B. licheniformis*, where they consider it is advantageous to do so.

8. NZFGC supports amendment to the Food Standards Code as proposed by FSANZ to permit beta-amylase from GM *B. licheniformis* to be used in the Australian and New Zealand food supply.