



29 June 2022

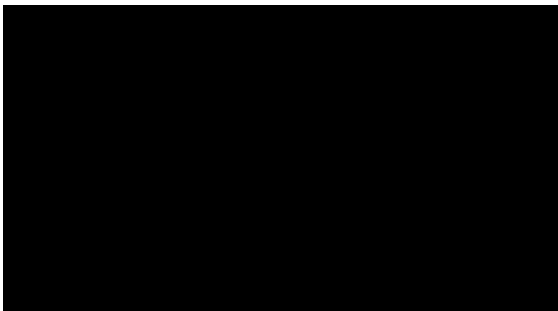
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the *Call for Submissions – Application A1246: Phospholipase A1 from GM Asperillus oryzae*.

Yours sincerely





***Call for Submissions – Application A1246:  
Phospholipase A1 from GM Asperillus  
oryzae***

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

**29 June 2022**

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## NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“**NZFGC**”) welcomes the opportunity to comment on the *Call for Submissions – Application A1246: Phospholipase A1 from GM Asperillus oryzae*.
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.

### THE APPLICATION

3. Novozymes Australia has applied to vary the Australia New Zealand Food Standards Code (the “**Food Standards Code**”) to permit the use of the phospholipase A1 sourced from GM *Aspergillus oryzae* (“**A. oryzae**”). This organism contains phospholipase A1 gene from *Valsaria rubricosa* (“**V. rubricosa**”). Novozymes believes the benefits of using the enzyme in the bakery industry is improved dough strength resulting in increased fermentation tolerance and better stability during baking.

### COMMENTS

4. NZFGC notes that Novozymes has made 2 previous applications to bring processing aids to the Australian and New Zealand market and that there is already one phospholipase A1 processing aid approved in the Food Standards Code (sourced from a GM strain of *A. oryzae* containing phospholipase A1 gene from *Fusarium venenatum*).
5. FSANZ is familiar with both the company and the type of processing aid. The key differences are the GM source and the gene. There is a phospholipase A2 processing aid sourced from porcine pancreas as well as a phospholipase A2 processing aid sourced from *Aspergillus niger*, containing the gene isolated from porcine pancreas. There are no genes in processing aids from *V. rubricosa*.
6. Notwithstanding these differences, FSANZ ‘s risk assessment concluded, as it has for previous similar processing aids, that no public health or safety concerns were identified. It noted that *A. oryzae* has a long history of safe use as a source of processing aids and NZFGC notes that *A. oryzae* is referenced as an origin around twenty times in Schedule 18 of the Food Standards Code.
7. FSANZ’s risk management notes that in general processing aids are exempt from the requirement to be included in the ingredients list and that GM food used as a processing aid is not required to be labelled as GM but may be. Therefore, no labelling requirements generally apply to this processing aid, a position that NZFGC continues to support.
8. Internationally, Codex Alimentarius does not have a standard for processing aids or for enzymes. However, this particular processing aid has been approved for use in Denmark and France.
9. In terms of cost-benefit, the costs to government of amending the Food Standards Code are outweighed by the potential benefit to the industry from having approved access to choose to use this processing aid.

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10. In conclusion, NZFGC agrees with the FSANZ conclusion that the processing aid should be included in the Food Standards Code and we agree with the draft variation as prepared by FSANZ in Attachment A of the Call for Submissions.