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

Due date of submission – 27 January 2021

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).

Application A1206 – Subtilisin from GM *Bacillus licheniformis* as a processing aid (enzyme) seeks to permit the use of the enzyme subtilisin from a genetically modified (GM) strain of *Bacillus licheniformis* (*B. licheniformis*).

From the Food Standards Australia New Zealand (FSANZ) Assessment report it is understood that:

- Subtilisin from the GM *B. licheniformis* (the enzyme) is used in the manufacture of potable alcohol. The enzyme would not perform a function in these products at the point of sale, and therefore meets the requirements for use as a processing aid.
- The enzyme is derived from a GM strain of *B. licheniformis* containing the subtilisin gene from *Pyrococcus furiosus*.
- *B. licheniformis* has a long history of safe use in food enzyme production and the Code currently permits several enzymes derived from the organism.
- An enzyme preparation containing subtilisin received Generally Recognised as Safe (GRAS) approval from the US FDA, reflecting this history of safe use.

It is also understood that, as no genetically modified DNA or novel protein will remain in the food treated with the enzyme, there are no 'genetically modified' labelling requirements for use of this enzyme when used as a processing aid in the production of food.

On the basis of the information above and FSANZ's conclusion that there are no public health and safety issues associated with the use of subtilisin from GM *B. licheniformis* as a processing aid, the departments support the progression of Application A1206.