

SUBMISSION FOR APPLICATION A1045 – Bacteriophage preparation P100 as a processing aid

Food Policy and Programs Branch, SA Health

26 October 2011

Thank you for the opportunity to provide comments to the 1st Assessment Report for A1045.

SA Health supports **Option 2** – to proceed to development of a food regulatory measure to vary Standard 1.3.3 – Processing Aids – of the Food Standards Code to add P100 as an approved processing aid for the surface treatment of non-liquid ready-to-eat foods.

Comments are provided below to inform the Second Assessment Report.

Medical use

No reference has been made in the Report to the current or potential use of bacteriophage technology in the medical field. As with antibiotic use in foods, it would be useful to know if there was any potential for the use of bacteriophages in medical treatment and if so, what provisions are made to ensure there would be no health implications from its corresponding use in foods.

Labelling

The Labelling Law and Policy Review report (Recommendation 28) recommended that 'all foods and ingredients that have been processed by new technologies be required to be labelled for 30 years from the time of their introduction into the human food chain; the application of this principle to be based on scientific evidence of direct impact on, or modification of, the food/ingredient to be consumed'.

Although P100 appears to act as a processing aid not an additive, and therefore is not present in the final food, there may be consumer expectation that such foods are labelled to indicate the use of bacteriophages in their preparation. The use of a live organism is unprecedented in Standard 1.3.3 and supports an individual approach to labelling. Consideration should therefore be given to labelling food products that have used this new method of treatment.

Further Consultation

Due to the potential concerns arising from the use of a live organism as a processing aid, it is suggested that a teleconference be convened with jurisdictions prior to finalising the drafting for the second assessment to discuss areas of concern. This will provide an opportunity for jurisdictions to hear from the technical experts in FSANZ and for FSANZ to hear any concerns of jurisdictions.

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