

# **SUBMISSION FROM SA HEALTH**

## **18 August 2017**

### **Application A1130- Triacylglycerol Lipase as a Processing Aid (Enzyme)**

SA Health welcomes the opportunity to provide comment on this application. SA Health generally supports the application as the FSANZ safety assessment has concluded that there are no public health and safety concerns relating to permitting the enzyme triacylglycerol lipase sourced from *C. cylindracea* as an enzyme processing aid. However, some suggestions are provided to the proposed drafting for the purpose of clarity.

Proposed drafting -

#### **1 Name**

This instrument is the *Food Standards (Application A1130 – Triacylglycerol Lipase as a Processing Aid (Enzyme)) Variation*.

#### **2 Variation to a standard in the Australia New Zealand Food Standards Code**

The Schedule varies a Standard in the *Australia New Zealand Food Standards Code*.

#### **3 Commencement**

The variation commences on the date of gazettal.

#### **Schedule**

<b>[1] Schedule 18</b> is varied by inserting in the table to subsection S18—9(3), in alphabetical order	For use in the manufacture of bakery products and dairy products and in the processing of fats and oils.	GMP
Lipase, triacylglycerol (EC 3.1.1.3) sourced from <i>Candida cylindracea</i>		

The drafting includes the terms “bakery products”, “dairy products” and “fats and oils”. These terms are not defined in the Food Standards Code, in Standard 1.1.2 - Definitions used throughout the Code.

The proliferation of food terms that are not defined in Standard 1.1.2 make it difficult for interpretation and enforcement as to which foods the processing aid is permitted to be used in. It is important to maintain consistency in the terms used throughout the Code.

In Standard 1.1.2 the term “edible oils” is defined and may be a more suitable term than “fats and oils”.

*edible oil means the triglycerides, diglycerides, or both the triglycerides and diglycerides of fatty acids of plant or animal origin, including aquatic plants and aquatic animals, with incidental amounts of free fatty acids, unsaponifiable constituents and other lipids including naturally occurring gums, waxes and phosphatides.*

In Standard 1.1.2 the term “bakery products” is not defined. Although in the Code there is a Standard 2.1.1 Cereal and cereal products, but this does not define the term. The meaning of “bakery products” is not clear as to which foods are captured by the regulation. Dictionary definitions refer to a room with an oven or bakery where food is baked. Baked goods thus could be wider than just cereal products such as bread and biscuits, but include pizzas, pies, sausage rolls, and custards.

In Standard 1.1.2 the term “dairy products” is not defined. Although in the Code there is a PART 2.5 Dairy products, but this does not define the term. The meaning of “dairy products” is not clear as to which foods are captured by the regulation.