

SA HEALTH SUBMISSION ON -

Application A1175

Rapeseed protein isolate as a novel food

4 September 2020

SA Health welcomes the opportunity to provide comment on – Application A1175
Rapeseed protein isolate as a novel food

SA Health supports permitting rapeseed protein isolate as a novel food but has concerns about the proposed drafting using Schedule 3 varied by inserting S3—40 Specification for rapeseed protein isolate.

The Food Standards Code was previously reviewed to present regulations using horizontal standards. By creating a vertical regulation specifically for an individual food product by including specifications does not seem to be appropriate and is prescriptive. By continually drafting individual specifications in the Code will proliferate individual standards and make the Code unwieldy, difficult to read and interpret.

The specification provided includes parameters such as appearance, composition, purity, metals, microbiological.

S3—40 Specification for rapeseed protein isolate

For rapeseed protein isolate, the specifications are the following:

- (a) Appearance – tan powder;
- (b) Composition:
 - (i) Total protein (%) – no less than 90; and
 - (ii) Carbohydrates (%) – no more than 7; and
 - (iii) Fat (%) – no more than 2; and
 - (iv) Ash (%) – no more than 4; and
 - (v) Moisture (%) – no more than 7;
- (c) Purity:
 - (i) Glucosinolates (µmol/g) – no more than 1;
 - (ii) Erucic acid (%) – no more than 0.005;
 - (iii) Phytates (% w/w) – no more than 1.5;
- (d) Metals:
 - (i) Lead (mg/kg) – no more than 0.5;
- (e) Microbiological:
 - (i) Total plate count (cfu/g) no more than 10,000; and
 - (ii) *E. coli* (cfu/10g) absent; and
 - (iii) *Salmonella* spp. (cfu/25g) absent; and
 - (iv) Yeasts and moulds (cfu/g) less than 100.

Looking at the specification, the regulation specifies the appearance of the isolate to be tan in colour. This is a prescriptive quality regulation that does not serve to protect public health and safety. The colour is not important to regulate.

Similarly, the drafting provides a prescriptive regulation of the composition, again not a measure to protect public health and safety. However, it is restrictive to manufacturing variations. This quality is better controlled by the manufacture determining the specification for their own product rather than putting it in a standard.

Purity where there is a public health and safety risk such as for erucic acid would be more consistently drafted with the Code if placed in Schedule 19 - Maximum levels of contaminants and natural toxicants. Schedule 19 already contains a limit for erucic acid in edible oils. This should be amended to also include a limit for erucic acid in rapeseed protein isolate. The maximum level (in mg/kg) for a particular food should be used rather than providing a percentage level as this is not consistent drafting.

Similarly, the specification for Metals, this should be placed in S19—4 Maximum levels of metal contaminants if lead level is a public health and safety risk.

Providing a microbiological specification for rapeseed protein isolate which by the risk assessment provides a low level of risk and is mainly to be used in cooked products, seems to be unnecessary to protect public health and safety. It would be better regulated by good manufacturing practice. Many other protein isolates from other sources such as soy or whey do not have microbiological specification in Schedule 27. If the risk assessment justifies a microbiological limit to be set for Rapeseed protein isolate then it should be listed in Schedule 27 Microbiological limits in food.

The proposed drafting also provides a definition for rapeseed protein isolate as -

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| Rapeseed protein isolate | <ol style="list-style-type: none">1. Must be derived from rapeseed press cake retained after oil pressing from the seeds of one or more of:<ol style="list-style-type: none">(a) <i>Brassica napus</i>;(b) <i>Brassica rapa</i>; or(c) <i>Brassica juncea</i>.2. Must not be added to:<ol style="list-style-type: none">(a) infant formula products; and(b) food for infants.3. Must comply with the specifications for rapeseed protein isolate listed in section S3—40. |
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It is questioned whether a definition is required to be included in the drafting, since the common understanding of rapeseed protein isolate may be sufficient for enforcement. Many other protein isolates such as whey or soy are not defined in a standard and the dictionary definition suffices.

If a definition for rapeseed protein isolate is justified, then it should not be included in a specification, but placed in the preliminary provisions where other definitions for food are provided. This makes navigating the Code easier for enforcement purposes.