



AUSTRALIAN
**FOOD &
GROCERY**
COUNCIL



AFGC Response

Public consultation:

**A1318 - Steviol glycosides produced by enzymatic
conversion using enzymes produced by GM *Escherichia
coli* BL21**

20 May 2025

CONSULTATION QUESTIONS

ABOUT YOU

Full name

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Are you making a submission as an individual, or on behalf of an organisation?

Organisation - Australian Food & Grocery Council

Which group do you most identify with?

Food Industry

If you wish to provide general background information about yourself or your organisation (if any), include this in the box below.

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, beverage and grocery manufacturing sector. With an annual turnover in the 2022-23 financial year of \$162 billion, Australia's food and grocery manufacturing sector makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity. Each business in the sector has contributed towards an industry-wide \$4.2 billion capital investment in 2022-23. Food, beverage and grocery manufacturing together forms Australia's largest manufacturing sector, representing over 32 per cent of total manufacturing turnover in Australia. The industry makes a large contribution to rural and regional Australia economies, with almost 40 per cent of its 281,000 employees being in rural and regional Australia. It is essential to the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies. The industry has a clear view, outlined in Sustaining Australia: Food and Grocery Manufacturing 2030, of its role in the expansion of domestic manufacturing, jobs growth, higher exports and enhancing the sovereign capability of the entire sector.

YOUR SUBMISSION

Have you read the A1318 Consultation documents?

Yes

Please provide your overall view on FSANZ's assessment for application A1318 and the draft regulatory measure.

Support

Do not support

Both support/do not support

Other

Please explain your response below.

The AFGC welcomes the opportunity to comment on Application A1318 - Steviol glycosides produced by enzymatic conversion using enzymes produced by GM *Escherichia coli* BL21.

The AFGC understands that the applicant, Sichuan Ingia Biosynthetic Co., Ltd has applied to FSANZ to amend the Australia New Zealand Food Standards Code (the Code) to permit the use of three new enzymes expressed in a genetically modified (GM) strain of *Escherichia coli* BL21, for the enzymatic conversion of rebaudioside A (extracted from purified stevia leaf extract) to produce rebaudioside M; including a new specification to permit the applicant's method of production using these enzymes.

The AFGC has reviewed the Application assessment and Supporting Document 1: Risk assessment. Both documents provide comprehensive scientific evidence that the proposed new enzymes produced by the GM *Escherichia coli* as processing aids in the manufacture of steviol glycosides are technologically justified and present no consumer food safety or health implications. The AFGC therefore supports the draft regulatory measure.

If there is any other information you would like to provide for the application A1318 consultation, please include this in the box below.

The AFGC wishes to highlight a typographical error in the EC number for sucrose synthase sourced from *Escherichia coli* K-12 in subparagraph S3—35(2)(f)(ii) of the draft variation to the Code in Attachment A of the consultation document.

The current text in the draft variation states:

“(ii) sucrose synthase (EC 2.4.13) sourced from *Escherichia coli* K-12;”

The text should be:

“(ii) sucrose synthase (EC 2.4.1.13) sourced from *Escherichia coli* K-12;”

CONFIDENTIAL INFORMATION

Do you wish to provide confidential information as part of your submission?

No