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SCIENTIFIC OPINION

Safety evaluation of the food enzyme mucorpepsin from the non-genetically modified *Rhizomucor miehei* strain LP-N836

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Abstract

The food enzyme mucorpepsin (EC 3.4.23.23) is produced with the non-genetically modified *Rhizomucor miehei* strain LP-N836 by Meito Sangyo Co., Ltd. The native enzyme can be chemically modified to produce a more thermolabile form. The food enzyme is free from viable cells of the production organism. It is intended to be used in the processing of dairy products for the production of cheese and fermented dairy products. Dietary exposure to the food enzyme-total organic solids (TOS) was estimated to be up to 0.108 mg TOS/kg body weight (bw) per day in European populations. Genotoxicity tests did not indicate a safety concern. The systemic toxicity was assessed by means of a repeated dose 90-day oral toxicity study in rats. The Panel identified a no observed adverse effect level of 95 mg TOS/kg bw per day, the mid-dose tested, which when compared with the estimated dietary exposure, resulted in a margin of exposure of at least 880. A search for the similarity of the amino acid sequence of the food enzyme to known allergens was made and four matches with respiratory allergens and one with a food allergen (mustard) were found. The Panel considered that the risk of allergic reactions upon dietary exposure to this food enzyme, particularly in individuals sensitised to mustard proteins, cannot be excluded. Based on the data provided, the Panel concluded that both the native and thermolabile forms of this food enzyme do not give rise to safety concerns under the intended conditions of use.

KEYWORDS

aspartic endopeptidase, EC 3.4.23.23, food enzyme, microbial rennet, Mucorpepsin, *Rhizomucor miehei*

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1 | INTRODUCTION

Article 3 of the Regulation (EC) No 1332/2008[1] provides definition for 'food enzyme' and 'food enzyme preparation'.

'Food enzyme' means a product obtained from plants, animals or microorganisms or products thereof including a product obtained by a fermentation process using microorganisms: (i) containing one or more enzymes capable of catalysing a specific biochemical reaction; and (ii) added to food for a technological purpose at any stage of the manufacturing, processing, preparation, treatment, packaging, transport or storage of foods.

'Food enzyme preparation' means a formulation consisting of one or more food enzymes in which substances such as food additives and/or other food ingredients are incorporated to facilitate their storage, sale, standardisation, dilution or dissolution.

Before January 2009, food enzymes other than those used as food additives were not regulated or were regulated as processing aids under the legislation of the Member States. On 20 January 2009, Regulation (EC) No 1332/2008 on food enzymes came into force. This Regulation applies to enzymes that are added to food to perform a technological function in the manufacture, processing, preparation, treatment, packaging, transport or storage of such food, including enzymes used as processing aids. Regulation (EC) No 1331/2008[2] established the European Union (EU) procedures for the safety assessment and the authorisation procedure of food additives, food enzymes and food flavourings. The use of a food enzyme shall be authorised only if it is demonstrated that:

- it does not pose a safety concern to the health of the consumer at the level of use proposed;
- there is a reasonable technological need;
- its use does not mislead the consumer.

All food enzymes currently on the European Union market and intended to remain on that market, as well as all new food enzymes, shall be subjected to a safety evaluation by the European Food Safety Authority (EFSA) and approval via an EU Community list.

The 'Guidance on submission of a dossier on food enzymes for safety evaluation' (EFSA, 2009a) lays down the administrative, technical and toxicological data required.

1.1 | Background and Terms of Reference as provided by the requestor

1.1.1 | Background as provided by the European Commission

Only food enzymes included in the Union list may be placed on the market as such and used in foods, in accordance with the specifications and conditions of use provided for in Article 7 (2) of Regulation (EC) No 1332/2008 on food enzymes.[1]

Six applications have been introduced by the companies "Decernis, LLC", "Keller and Heckman LLP", the "Association of Manufacturers and Formulators of Enzyme Products (AMFEP)" and "Novozymes A/S" for the authorisation of the food enzymes Cyclomaltodextrin glucanotransferase from *Geobacillus stearothermophilus*, Dextranase from *Chaetomium gracile*, Subtilisin from *Bacillus licheniformis*, Mucorpepsin from *Rhizomucor miehei*, Animal rennet consisting of chymosin and pepsin from the abomasum of *Bos primigenius* (cattle), *Bubalus bubalis* (buffalo), *Capra aegagrus hircus* (goat) and *Ovis aries* (sheep), and Lipase from a genetically modified strain of *Aspergillus niger* (strain NZYM-DB), respectively.

Following the requirements of Article 12.1 of Regulation (EC) No 234/2011[3] implementing Regulation (EC) No 1331/2008, the Commission has verified that the six applications fall within the scope of the food enzyme Regulation and contain all the elements required under Chapter II of that Regulation.

1.1.2 | Terms of Reference

The European Commission requests the European Food Safety Authority to carry out the safety assessments on the food enzymes Cyclomaltodextrin glucanotransferase from *Geobacillus stearothermophilus*, Dextranase from *Chaetomium gracile*, Subtilisin from *Bacillus licheniformis*, Mucorpepsin from *Rhizomucor miehei*, Animal rennet consisting of chymosin and pepsin from the abomasum of *Bos primigenius* (cattle), *Bubalus bubalis* (buffalo), *Capra aegagrus hircus* (goat) and *Ovis aries* (sheep), and Lipase from a genetically modified strain of *Aspergillus niger* (strain NZYM-DB) in accordance with Article 17.3 of Regulation (EC) No 1332/2008 on food enzymes.

[1]Regulation (EC) No 1332/2008 of the European Parliament and of the Council of 16 December 2008 on Food Enzymes and Amending Council Directive 83/417/EEC, Council Regulation (EC) No 1493/1999, Directive 2000/13/EC, Council Directive 2001/112/EC and Regulation (EC) No 258/97. OJ L 354, 31.12.2008, pp. 7–15.

[2]Regulation (EC) No 1331/2008 of the European Parliament and of the Council of 16 December 2008 establishing a common authorisation procedure for food additives, food enzymes and food flavourings. OJ L 354, 31.12.2008, pp. 1–6.

[3]Commission Regulation (EU) No 234/2011 of 10 March 2011 implementing Regulation (EC) No 1331/2008 of the European Parliament and of the Council establishing a common authorisation procedure for food additives, food enzymes and food flavourings. OJ L 64, 11.3.2011, pp. 15–24.

1.2 | Interpretation of the Terms of Reference

The present scientific opinion addresses the European Commission's request to carry out the safety assessment of the food enzyme Mucorpepsin from *Rhizomucor miehei* submitted by AMFEP.

The application was submitted initially as a joint dossier and identified as the EFSA-Q-2015-00233. During a meeting between EFSA, the European Commission and AMFEP,[4] it was agreed that joint dossiers will be split into individual data packages.

The current opinion addresses one data package originating from the former joint dossier EFSA-Q-2015-00233. This data package is identified as EFSA-Q-2022-00179 and concerns the food enzyme mucorpepsin produced from the *Rhizomucor miehei* strain LP-N836 and submitted by Meito Sangyo Co., Ltd.

2 | DATA AND METHODOLOGIES

2.1 | Data

The applicant has submitted a dossier in support of the application for authorisation of the food enzyme mucorpepsin from a non-genetically modified *Rhizomucor miehei* strain LP-N836.

Additional information was requested from the applicant during the assessment process on 11 May 2022 and 20 January 2023, and received on 10 November 2022 and 20 October 2023 (see 'Documentation provided to EFSA').

2.2 | Methodologies

The assessment was conducted in line with the principles described in the EFSA Guidance on transparency in the scientific aspects of risk assessment (EFSA, 2009b) and following the relevant existing guidance documents of the EFSA Scientific Committee.

The 'Guidance on the submission of a dossier on food enzymes for safety evaluation' (EFSA, 2009b) as well as the 'Statement on characterisation of microorganisms used for the production of food enzymes' (EFSA CEP Panel, 2019) have been followed for the evaluation of the application. Additional information was requested in accordance with the updated 'Scientific Guidance for the submission of dossiers on food enzymes' (EFSA CEP Panel, 2021) and the guidance on the 'Food manufacturing processes and technical data used in the exposure assessment of food enzymes' (EFSA CEP Panel, 2023).

3 | ASSESSMENT

IUBMB nomenclature	Mucorpepsin
Systematic name	Aspartic endopeptidase
Synonyms	Microbial rennet, *Mucor* rennin
IUBMB no	EC 3.4.23.23
CAS no	148465-73-0
EINECS no	642-981-3

Mucorpepsins catalyse the hydrolysis of proteins, including the peptide bond Phe105-Met106 of κ-casein in milk, resulting in the destabilisation of casein micelles and causing milk to clot. The food enzyme under assessment is intended to be used in the processing of dairy products for the production of cheese and fermented dairy products.

3.1 | Source of the food enzyme

The mucorpepsin is produced with the non-genetically modified filamentous fungus *Rhizomucor miehei* strain LP-N836, which is deposited at the National Institute of Technology and Evaluation (NITE) Biological Research Center (Japan) with the deposit number [redacted]. The production strain was identified as *R. miehei* by sequence analysis of the internal transcribed spacer (ITS) rDNA region showing 100% identity with the ITS region of the type strain *R. miehei* [redacted].[5] The production strain was obtained from the original isolate by conventional mutagenesis.

[4]The full detail is available at the https://www.efsa.europa.eu/en/events/event/ad-hoc-meeting-industry-association-amfep-joint-dossiers-food-enzymes

[5]Technical dossier/Annex 5 and additional information November 2022/Annexes 5 (attachment request 4 and 7).

3.2 | Production of the food enzyme

The food enzyme is manufactured according to the Food Hygiene Regulation (EC) No 852/2004,[6] with food safety procedures based on Hazard Analysis and Critical Control Points, and in accordance with current Good Manufacturing Practice.[7]

The production strain is grown as a pure culture using a typical industrial medium in a submerged, batch or fed-batch fermentation system with conventional process controls in place. After completion of the fermentation, the solid biomass is removed from the fermentation broth by filtration. The filtrate containing the enzyme is further purified and concentrated, including an ultrafiltration step in which enzyme protein is retained, while most of the low molecular mass material passes the filtration membrane and is discarded.[8] The food enzyme concentrate is acidified to remove esterase (lipase) activity.[9]

The native food enzyme may be treated with [redacted] to increase the heat sensitivity of the enzyme.[10] After the treatment, any remaining [redacted] is removed by addition of catalase.[11,12] The modified food enzyme concentrate is then stabilised with [redacted] and filtered. The applicant provided information on the identity of the substances used to control the fermentation and in the subsequent downstream processing of the food enzyme.[13]

The Panel considered that sufficient information has been provided on the manufacturing process and the quality assurance system implemented by the applicant to exclude issues of concern.

3.3 | Characteristics of the food enzyme

3.3.1 | Properties of the food enzyme

The mucorpepsin is a single polypeptide chain of [redacted] amino acids. The molecular mass of the mature protein, calculated from the amino acid sequence, is around [redacted]. The food enzyme was analysed by sodium dodecyl sulfate-polyacrylamide gel electrophoresis. A consistent protein pattern was observed across all batches. The gels showed a single major protein band corresponding to an apparent molecular mass of about [redacted], consistent with the expected mass of the enzyme.[14] No other enzyme activities were reported.

The in-house determination of mucorpepsin activity is based on the hydrolysis of casein resulting in milk clotting (reaction conditions: pH 5.5, 32°C). The enzymatic activity is determined by measuring the time needed for visual flocculation of a standard milk substrate. The mucorpepsin activity is quantified relative to a reference standard with known milk-clotting activity and expressed in International Milk-Clotting Units (IMCU)/g.[15]

The food enzyme has a temperature optimum around 50°C, and a pH optimum around pH 5.5, the lowest pH value tested.[16] Thermostability was tested by incubating the enzyme at different temperatures, for 30 min (native form) or 15 s (thermolabile form). For the native form, the enzyme activity decreased above 50°C, showing no residual activity above 65°C. The activity of the thermolabile form decreased above 50°C, showing very low residual activity at 70°C.

3.3.2 | Chemical parameters

Data on the chemical parameters of the food enzyme were provided for three batches of the thermolabile form of the food enzyme used for commercialisation and two batches produced for the toxicological tests (Table 1).[17] The mean total organic solids (TOS) of the three food enzyme batches for commercialisation was 5.0% and the mean enzyme activity/TOS ratio was 26.4 IMCU/mg TOS.

[6]Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of food additives. OJ L 226, 25.6.2004, pp. 3–21.

[7]Technical dossier/Annex 6.

[8]Technical dossier/Annex 7, additional information November 2022/Annex 7–2 and additional information October 2023/Annex 7–2 Rev.

[9]Technical dossier/Additional information November 2022/Annex 7–2 and additional information October 2023/Annex 7–2 Rev.

[10]Technical dossier/Additional information November 2022/Annex 7–2 and additional information October 2023/Annex 7–2 Rev.

[11]Technical dossier/Additional information November 2022/Annexes 7–2, 17, 18, 19 and removal procedure document and additional information October 2023 (attachment request 1).

[12]The catalase used in the manufacturing process of the mucorpepsin was assessed by EFSA (EFSA Q-2016-00532).

[13]Technical dossier/Additional information November 2022/Annex 8–2 and additional information October 2023 (Attachment request 1).

[14]Technical dossier p. 33 and additional information November 2022 (attachment request 2).

[15]Technical dossier/Annex 2.

[16]Technical dossier pp. 37–38.

[17]Technical dossier pp. 32, 68, Annexes 1 and 3 additional information November 2022 (attachment request 3) and additional information October 2023 (attachment request 2).

TABLE 1 Composition of the thermolabile form of the food enzyme.

		Batches				
Parameters	**Unit**	**1**	**2**	**3**	**4**[a]	**5**[b]
Mucorpepsin activity	IMCU/g[c]	1307	1251	1365	1205	1274
Protein	%	3.8	3.0	2.7	3	3.1
Ash	%	15.1	14.8	15.4	16.5	15.1
Water	%	79.8	79.8	80.1	79.7	79.5
Total organic solids (TOS)[d]	%	5.1	5.4	4.5	3.8	5.4
Mucorpepsin activity/TOS ratio	IMCU/mg TOS	25.6	23.2	30.3	31.7	23.6

[a]Batch used for the Ames test, the in vitro mammalian chromosomal aberration test and the repeated dose 90-day oral toxicity study in rats/rodents.
[b]Batch used for the in vitro mammalian cell micronucleus test.
[c]IMCU: International Milk Clotting Units (see Section 3.3.1).
[d]TOS calculated as 100% – % water – % ash.

3.3.3 | Purity

The lead content in the three commercial batches and in the batches used for toxicological studies was below 5 mg/kg which complies with the specification for lead[18,19] as laid down in the general specifications for enzymes used in food processing (FAO/WHO, 2006).

The food enzyme complies with the microbiological criteria for total coliforms, *Escherichia coli* and *Salmonella*[20] as laid down in the general specifications for enzymes used in food processing (FAO/WHO, 2006). No antimicrobial activity was detected in any of the tested batches.[21]

Strains of *Rhizomucor*, in common with most filamentous fungi, have the capacity to produce a range of secondary metabolites. The possible presence of metabolites of concern is addressed by the toxicological examination of the food enzyme TOS.

The Panel considered that the information provided on the purity of the food enzyme was sufficient.

3.3.4 | Viable cells of the production strain

The absence of viable cells of the production strain in the food enzyme was demonstrated in three independent batches analysed in triplicate. [redacted] No colonies were produced. A positive control was included for each of the batches tested.

3.4 | Toxicological data[22]

A battery of toxicological tests, including a bacterial reverse mutation test (Ames test), an in vitro mammalian chromosomal aberration test, an in vitro mammalian cell micronucleus test and a repeated dose 90-day oral toxicity study in rats, has been provided. The batches 4 and 5 (Table 1) used in these studies are a thermolabile form of the food enzyme which have a similar chemical composition and activity/TOS value as the thermolabile enzyme batches used for commercialisation and were considered suitable as test items.

In the view of the Panel, the thermolabile form of the food enzyme is also suitable to evaluate the toxicological profile of the native form. This consideration is based on the identical production process, only excluding the treatment by [redacted] and catalase, which is not expected to modify the toxicological profile of the enzyme.

3.4.1 | Genotoxicity

3.4.1.1 | *Bacterial reverse mutation test*

A bacterial reverse mutation test (Ames test) was performed according to the Organisation for Economic Co-operation and Development (OECD) Test Guideline 471 (OECD, 1997a) and following good laboratory practice (GLP).[23]

[18]Annexes/Annex 4 and Additional information November 2022/Annex 3 Rev.1.
[19]Pb LoD = 5 mg/kg.
[20]Annex/Annexes 3 and 4.
[21]Annex/Annexes 3 and 4.
[22]Technical dossier/pp. 63–68 and Annexes 12–14 and additional information October 2023 (attachment request 2).
[23]Technical dossier/Annex 12.

Four strains of Salmonella Typhimurium (TA98, TA100, TA1535 and TA1537) and *Escherichia coli* WP2uvrA were used with or without metabolic activation (S9-mix), applying the pre-incubation method.

The dose-finding study was performed in duplicate at concentrations ranging from 19.5 to 5000 μg/plate (corresponding to 0.741–190 μg TOS/plate) and the inhibition of cell growth was observed at 5000 μg/plate in S. Typhimurium TA100, TA1535 and TA1537 with S9-mix. Based on these results, two experiments were carried out in triplicate, using five different concentrations of the food enzyme ranging from 313 to 5000 μg/plate, corresponding to 11.9, 23.6, 47.5, 95 and 190 μg TOS/plate without S9-mix and six different concentrations of the food enzyme ranging from 156 to 5000 μg/plate, corresponding to 5.9, 11.9, 23.6, 47.5, 95 and 190 μg TOS/plate with S9-mix.

In both experiments, the inhibition of cell growth was observed at 5000 μg/plate in S. Typhimurium TA100 and TA1535, and at 2500 and 5000 μg/plate in S. Typhimurium TA1537 with S9-mix. Upon treatment with the food enzyme, there was no biologically relevant increase in the number of revertant colonies above the control values, in any strain tested, with or without S9-mix.

The Panel concluded that the food enzyme mucorpepsin did not induce gene mutations under the test conditions applied in this study.

3.4.1.2 | *In vitro mammalian chromosomal aberration test*

The in vitro mammalian chromosomal aberration test was carried out according to OECD Test Guideline 473 (OECD, 1997b) and following GLP.[24] The test was performed with duplicate cultures of Chinese hamster lung fibroblast (CHL/IU) cells.

The cell cultures were treated with the food enzyme either with or without metabolic activation (S9-mix). In a range-finding test, no cytotoxicity above 50% was seen at any concentration tested up to 5000 μg /mL. Based on these results, the cells were exposed to the food enzyme and scored for chromosomal aberrations at concentrations of 1250, 2500 and 5000 μg/mL (corresponding to 47.5, 95 and 190 μg TOS/mL) in a short-term treatment (6-hour exposure and 18-hour recovery period) either with or without S9-mix and in a long-term treatment (24- or 48-hour exposure without recovery period) without S9-mix.

No cytotoxicity was seen either in the short-term (with or without S9-mix) or in the long-term treatment. The frequency of structural and numerical aberrations was not statistically significantly different to the negative controls at all concentrations tested.

The Panel concluded that the food enzyme mucorpepsin did not induce an increase in the frequency of structural and numerical aberrations under the test conditions applied in this study.

3.4.1.3 | *In vitro mammalian cell micronucleus test*[25]

The in vitro mammalian cell micronucleus test was carried out according to OECD Test Guideline 487 (OECD, 2016) and following GLP. A range finding test and a main experiment were carried out with duplicate cultures of human lymphoblastoid (TK6) cells. The cell cultures were treated with the food enzyme with or without metabolic activation (S9-mix).

A range-finding test was performed with the highest concentration level set at 5000 μg TOS/mL in a short-term treatment (4-h exposure and 20-h recovery period) with and without S9-mix and in a long-term treatment (24-h exposure without recovery period). The 50% cell growth inhibition concentration (IC_{50}) was 2310 μg TOS/mL in the short-term treatment without S9-mix, 3080 μg TOS/mL in the short-term treatment with S9-mix and 1920 μg TOS/mL in the long-term treatment. On the basis of these results, cells were exposed to the food enzyme and scored for micronuclei frequency at concentrations of 1500, 1750, 2000 and 2250 μg TOS/mL in the short-term treatment without S9-mix, at 1500, 2000 and 2500 μg TOS/mL in the short-term treatment with S9 and at 1250, 1750 and 2250 μg TOS/mL in the long-term treatment.

Cytotoxicity of 46%, 49% and 47% was observed at the highest concentration tested in short-term treatment without S9-mix, with S9-mix and in long-term treatment, respectively. The frequency of binucleated cells with micronuclei (MNBN) was not statistically significantly different to the negative controls at all concentrations tested in the short- or long-term treatment.

The Panel concluded that the food enzyme mucorpepsin did not induce an increase in the frequency of MNBNs under the test conditions applied in this study.

3.4.2 | Repeated dose 90-day oral toxicity study in rodents

The repeated dose 90-day oral toxicity study was performed in accordance with OECD Test Guideline 408 (OECD, 1998) and following GLP.[26] Groups of 10 male and 10 female Sprague–Dawley (Crl:CD(SD)) [SPF] rats received the food enzyme in doses of 1250, 2500 and 5000 mg/kg bw per day by gavage, corresponding to 47.5, 95 and 190 mg TOS/kg bw per day. Controls received the vehicle (water for injection).

No mortality was observed.

In the functional observations, a statistically significant increase in the rearing count was observed in low- and mid-dose males (+150% for both) in week 1 and a statistically significant decrease in the rearing count (−42%) in high-dose females in

[24]Technical dossier/Annex 13.

[25]Technical dossier/Additional information October 2023 (Attachment request 2).

[26]Technical dossier/Annex 14.

week 7. The Panel considered the changes as not toxicologically relevant as they were only recorded sporadically and there was no consistency between the changes in males and females.

Haematological investigation revealed a statistically significant decrease in eosinophil count (−39%) in high-dose males and a statistically significant increase in mean corpuscular volume (+3%) in high-dose females. The Panel considered the changes as not toxicologically relevant as they were only observed in one sex, the changes were small (both parameters) and there were no changes in other relevant parameters (in the total white blood cell count and in the red blood cell count, haemoglobin and haematocrit).

Clinical chemistry investigation revealed a statistically significant decrease in sodium concentration (−0.7%) in mid-dose males. The Panel considered the change as not toxicologically relevant as it was only observed in one sex, there was no dose–response relationship and the change was small.

Urinalysis revealed a statistically significant and dose-dependent increase in sodium excretion in low-, mid- and high-dose males (+38%, +90%, +174%, respectively) and in low-, mid- and high-dose females (+79%, +141%, +273%, respectively), and a statistically significant and dose-dependent increase in chloride excretion in mid- and high-dose males (+64%, +124%, respectively) and in mid- and high-dose females (+106%, +205%, respectively). According to the applicant, this increase in sodium and chloride excretion was due to high concentration of [redacted] in the test item [redacted]. The Panel concurred with this view and considered the changes as not toxicologically relevant as there were no histopathological changes in the kidneys.

Statistically significant changes in organ weights detected were an increase in the absolute (+18%) and relative weight (+22%) of seminal vesicles in mid-dose males. The Panel considered the changes as not toxicologically relevant as there was no dose–response relationship and there were no histopathological changes in the seminal vesicles.

The microscopic examination revealed minimal or mild hyperplasia of squamous epithelium of the limiting ridge in the stomach in low-, mid- and high-dose males (1/10, 3/10 and 10/10 vs. 0/10) and in low-, mid- and high-dose females (1/10, 2/10 and 9/10 vs. 0/10). These changes were considered by the Panel as test item-related as the incidence increased with increment of the doses and as a result of the irritating properties of the test item.

No other statistically significant or biologically relevant differences to controls were reported.

The Panel identified a no observed adverse effect level (NOAEL) of 95 mg TOS/kg bw per day, the mid-dose tested, based on the significant increase in the incidence of the minimal or mild hyperplasia of squamous epithelium of the limiting ridge in the stomach in both sexes at the high dose.

3.4.3 | Allergenicity

The allergenicity assessment considers only the food enzyme and not carriers or other excipients, which may be used in the final formulation.

The potential allergenicity of the mucorpepsin produced with *Rhizomucor miehei* strain LP-N836 was assessed by comparing its amino acid sequence with those of known allergens according to the 'Scientific opinion on the assessment of allergenicity of GM plants and microorganisms and derived food and feed of the Scientific Panel on Genetically Modified Organisms' (EFSA GMO Panel, 2010). Using higher than 35% identity in a sliding window of 80 amino acids as the criterion, five matches were found. The matching allergens were P00791.3, pepsin A from *Sus scrofa*; Aed a 11, a lysosomal aspartic protease from *Aedes aegypti*; Rhi o 1, an endopeptidase from *Rhizopus oryzae*; Asp f 10, an aspergillopepsin from *Aspergillus fumigatus* and Sin a 3, a non-specific lipid transfer protein type 1 from *Sinapis alba* (mustard), a known food allergen.[27]

No information was available on oral and respiratory sensitisation or elicitation reactions of this mucorpepsin.

Pepsin A from *Sus scrofa* is associated with occupational asthma and rhinitis (Añíbarro Bausela & Fontela, 1996; Cartier et al., 1984). Also, Rhi 0 1 and Asp f 10 are respiratory allergens. Several studies have shown that adults with occupational asthma may be able to ingest respiratory allergens without acquiring clinical symptoms of food allergy (Armentia et al., 2009; Brisman, 2002; Poulsen, 2004). Aspartic protease is associated with allergic reactions to insect bites, but allergic reactions after oral exposure have not been reported (Cantillo et al., 2017). Mustard is a food allergen and listed in Annex II of Regulation (EU) No 1169/2011.

[redacted], a substance that may cause allergies or intolerances (listed in the Regulation (EU) No 1169/2011),[28] is used as a raw material in the fermentation medium. In addition, [redacted], a known source of allergens, is present in the media fed to the microorganisms. However, during the fermentation process, these products will be degraded and utilised by the microorganisms for cell growth, cell maintenance and production of enzyme protein. In addition, the fungal biomass and fermentation solids are removed. Taking into account the fermentation process and downstream processing, the Panel considered that potentially allergenic residues from this source are not expected to be present in the food enzyme.

[27]Technical dossier/Annex 15 and additional information November 2022/Attachment request 12.

[28]Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004.

The Panel noted that catalase is used during the downstream processing of the thermolabile food enzyme and is likely to be present in the final product. Respiratory sensitisation to catalases has been reported, but as indicated above, sensitised individuals are usually able to ingest respiratory allergens without acquiring food allergic reactions.

The Panel considered that a risk of allergic reactions upon dietary exposure to this food enzyme, particularly in individuals sensitised to mustard proteins, cannot be excluded but the likelihood will not exceed that of consumption of mustard.

3.5 | Dietary exposure

3.5.1 | Intended use of the food enzyme

The food enzyme is intended to be used in two food manufacturing processes at the recommended use levels summarised in Table 2.

TABLE 2 Intended uses and recommended use levels of the food enzyme as provided by the applicant.[d]

Food manufacturing process[a]	Raw material (RM)	Recommended use level (mg TOS/kg RM)[b,c]
Processing of dairy products		
• Production of cheese	Milk	0.1–**3**
• Production of fermented dairy products	Milk	0.03–**1.2**

[a]The name has been harmonised by EFSA according to the 'Food manufacturing processes and technical data used in the exposure assessment of food enzymes' (EFSA CEP Panel, 2023).

[b]Based on 26.4 Unit/mg TOS.

[c]Numbers in bold represent the maximum recommended use levels which were used for calculation.

[d]Technical dossier/p. 58.

In cheese production, the food enzyme is added to milk during the coagulation step to hydrolyse κ-casein. Whey, a by-product, is separated from the curd during the draining step.[29] Curd is further processed into different types of cheese, whereas whey is used in the production of several foods including bakery products and beverages. The food enzyme partitions between curd and whey with a ratio of approximately 10:90 (Guinee & Wilkinson, 1992). The food enzyme-TOS remains in the final foods.

In the production of fermented milk products, the food enzyme is added to milk during the coagulation/fermentation step.[30] The food enzyme-TOS remains in the fermented milk products.

Based on data provided on thermostability (see Section 3.3.1), it is expected that this food enzyme may remain active in the final foods (cheese or fermented milk products), depending on the respective food manufacturing processes.

3.5.2 | Dietary exposure estimation

Chronic exposure to the food enzyme-TOS was calculated by combining the maximum recommended use level with individual consumption data (EFSA CEP Panel, 2021). The estimation involved selection of relevant food categories and application of technical conversion factors (EFSA CEP Panel, 2023). Exposure from all FoodEx categories was subsequently summed up, averaged over the total survey period (days) and normalised for body weight. This was done for all individuals across all surveys, resulting in distributions of individual average exposure. Based on these distributions, the mean and 95th percentile exposures were calculated per survey for the total population and per age class. Surveys with only one day per subject were excluded and high-level exposure/intake was calculated for only those population groups in which the sample size was sufficiently large to allow calculation of the 95th percentile (EFSA, 2011).

Table 3 provides an overview of the derived exposure estimates across all surveys. Detailed mean and 95th percentile exposure to the food enzyme-TOS per age class, country and survey, as well as contribution from each FoodEx category to the total dietary exposure are reported in Appendix A – Tables 1 and 2. For the present assessment, food consumption data were available from 48 dietary surveys (covering infants, toddlers, children, adolescents, adults and the elderly), carried out in 26 European countries (Appendix B). The highest dietary exposure to the food enzyme-TOS was estimated to be 0.108 mg TOS/kg bw per day in infants.

[29]Technical dossier/p. 56.

[30]Technical dossier/p. 57.

TABLE 3 Summary of the estimated dietary exposure to food enzyme–TOS in six population groups.

	Estimated exposure (mg TOS/kg body weight per day)					
Population group	**Infants**	**Toddlers**	**Children**	**Adolescents**	**Adults**	**The elderly**
Age range	3–11 months	12–35 months	3–9 years	10–17 years	18–64 years	≥ 65 years
Min–max mean (number of surveys)	0.002–0.030 (12)	0.012–0.039 (15)	0.006–0.020 (19)	0.003–0.010 (21)	0.002–0.007 (22)	0.002–0.007 (22)
Min–max 95th percentile (number of surveys)	0.011–0.108 (11)	0.032–0.103 (14)	0.016–0.051 (19)	0.009–0.020 (20)	0.006–0.020 (22)	0.005–0.017 (22)

3.5.3 | Uncertainty analysis

In accordance with the guidance provided in the 'EFSA opinion related to uncertainties in dietary exposure assessment' (EFSA, 2006), the following sources of uncertainties have been considered and are summarised in Table 4.

TABLE 4 Qualitative evaluation of the influence of uncertainties on the dietary exposure estimate.

Sources of uncertainties	Direction of impact
Model input data	
Consumption data: different methodologies/representativeness/underreporting/misreporting/no portion size standard	+/–
Use of data from food consumption surveys of a few days to estimate long-term (chronic) exposure for high percentiles (95th percentile)	+
Possible national differences in categorisation and classification of food	+/–
Model assumptions and factors	
Exposure to food enzyme-TOS was always calculated based on the recommended maximum use level	+
Selection of broad FoodEx categories for the exposure assessment	+
Use of recipe fractions in disaggregation FoodEx categories	+/–
Use of technical factors in the exposure model	+/–

Abbreviations: +, uncertainty with potential to cause overestimation of exposure; –, uncertainty with potential to cause underestimation of exposure.

The conservative approach applied to estimate the exposure to the food enzyme-TOS, in particular assumptions made on the occurrence and use levels of this specific food enzyme, is likely to have led to an overestimation of the exposure.

3.6 | Margin of exposure

The comparison of the NOAEL (95 mg TOS/kg bw per day) identified from the 90-day rat study with the derived exposure estimates of 0.002–0.039 mg TOS/kg bw per day at the mean and from 0.005 to 0.108 mg TOS/kg bw per day at the 95th percent resulted in a margin of exposure of at least 880.

4 | CONCLUSIONS

Based on the data provided and the derived margin of exposure, the Panel concluded that the native and the thermolabile forms of the food enzyme mucorpepsin produced with the non-genetically modified *Rhizomucor miehei* strain LP-N836 do not give rise to safety concerns under the intended conditions of use.

5 | REMARK

The use of the catalase from the non-genetically modified *Aspergillus niger* strain CTS 2093 as a raw material in the manufacture of the mucorpepsin under evaluation is not considered to raise a safety concern when used only for this purpose. However, the Panel noted that an assessment of the same catalase for food enzyme use (EFSA Q-2016-00532) could not exclude safety concerns when used in the manufacture of food.

6 | DOCUMENTATION AS PROVIDED TO EFSA

Application for authorisation of Mucorpepsin from *Rhizomucor miehei* LP-N836 in accordance with Regulation (EC) No 1331/2008. March 2022. Submitted by Meito Sangyo Co., Ltd.

Additional information. November 2022. Submitted by Meito Sangyo Co., Ltd.

Additional information. October 2023. Submitted by Meito Sangyo Co., Ltd.

ABBREVIATIONS

bw	body weight
CAS	Chemical Abstracts Service
CEP	EFSA Panel on Food Contact Materials, Enzymes and Processing Aids
EINECS	European Inventory of Existing Commercial Chemical Substances
FAO	Food and Agricultural Organisation of the United Nations
GLP	Good Laboratory Practice
GMO	genetically modified organism
IUBMB	International Union of Biochemistry and Molecular Biology
JECFA	Joint FAO/WHO Expert Committee on Food Additives
kDa	kiloDalton
LoD	limit of detection
MNBN	bi-nucleated cells with micronuclei
NOAEL	no observed adverse effect level
OECD	Organisation for Economic Cooperation and Development
TOS	total organic solids
WHO	World Health Organization

CONFLICT OF INTEREST

If you wish to access the declaration of interests of any expert contributing to an EFSA scientific assessment, please contact interestmanagement@efsa.europa.eu.

REQUESTOR

European Commission

QUESTION NUMBER

EFSA-Q-2022-00179

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NOTE

The full opinion will be published in accordance with Article 12 of Regulation (EC) No 1331/2008 once the decision on confidentiality will be received from the European Commission.

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SUPPORTING INFORMATION

Additional supporting information can be found online in the Supporting Information section at the end of this article.

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APPENDIX A

Dietary exposure estimates to the food enzyme-TOS in details

Appendix A can be found in the online version of this output (in the 'Supporting information' section). The file contains two sheets, corresponding to two tables.

Table 1: Average and 95th percentile exposure to the food enzyme-TOS per age class, country and survey.

Table 2: Contribution of food categories to the dietary exposure to the food enzyme-TOS per age class, country and survey.

APPENDIX B

Population groups considered for the exposure assessment

Population	Age range	Countries with food consumption surveys covering more than 1 day
Infants	From 12 weeks on up to and including 11 months of age	Bulgaria, Cyprus, Denmark, Estonia, Finland, France, Germany, Italy, Latvia, Portugal, Slovenia, Spain
Toddlers	From 12 months up to and including 35 months of age	Belgium, Bulgaria, Cyprus, Denmark, Estonia, Finland, France, Germany, Hungary, Italy, Latvia, Netherlands, Portugal, Republic of North Macedonia[a], Serbia[a], Slovenia, Spain
Children	From 36 months up to and including 9 years of age	Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Italy, Latvia, Netherlands, Portugal, Republic of North Macedonia[a], Serbia[a], Spain, Sweden
Adolescents	From 10 years up to and including 17 years of age	Austria, Belgium, Bosnia and Herzegovina[a], Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Italy, Latvia, Montenegro[a], Netherlands, Portugal, Romania, Serbia[a], Slovenia, Spain, Sweden
Adults	From 18 years up to and including 64 years of age	Austria, Belgium, Bosnia and Herzegovina[a], Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Montenegro[a], Netherlands, Portugal, Romania, Serbia[a], Slovenia, Spain, Sweden
The elderly[b]	From 65 years of age and older	Austria, Belgium, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Montenegro[a], Netherlands, Portugal, Romania, Serbia[a], Slovenia, Spain, Sweden

[a]Consumption data from these pre-accession countries are not reported in Table 3 of this opinion; however, they are included in Appendix B for testing purpose.

[b]The terms 'children' and 'the elderly' correspond, respectively, to 'other children' and the merge of 'elderly' and 'very elderly' in the Guidance of EFSA on the 'Use of the EFSA Comprehensive European Food Consumption Database in Exposure Assessment' (EFSA, 2011).