

GRAS Notices for Human Food Ingredients Produced Using Genetically Engineered Microbes

The Future of Microbial Biotechnology Workshop

Shayla West-Barnette, Ph.D.

FDA, Center for Food Safety and Applied Nutrition, Office of Food Additive Safety, Division of Food Ingredients

February 2nd, 2022

Overview



Who We Are & What We Do

- Organization
- Mission

Food, Drug & Cosmetic Act

- Definition of GRAS
- Requirements for GRAS Status

Uses of GE
Microbe-Produced
Ingredients

- Overview of Safety Considerations
- Examples

Conclusion

- Summary
- Where to Get More Information

Who We Are & What We Do



U.S. Food and Drug Administration (FDA)

Center for Food Safety and Applied Nutrition (CFSAN)

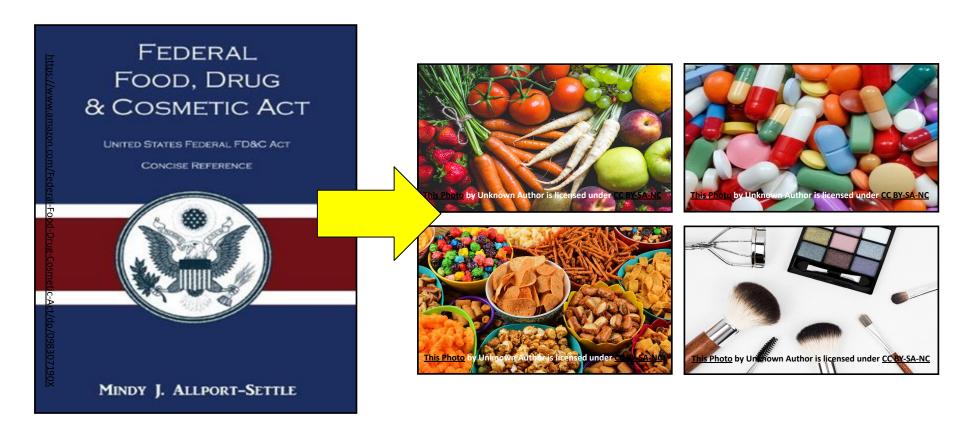
Office of Food Additive Safety (OFAS)

Division of Food Ingredients (DFI)





Federal Food, Drug & Cosmetic Act



The Law

Foods, Food Ingredients, Drugs & Cosmetics



Two Components of GRAS

General Recognition of Safety

GRAS

Safety data, information must:

- 1. Be generally available
- 2. Be generally accepted

The information supporting the GRAS conclusion must be generally available; it **cannot** be confidential.

Evidence of Safety

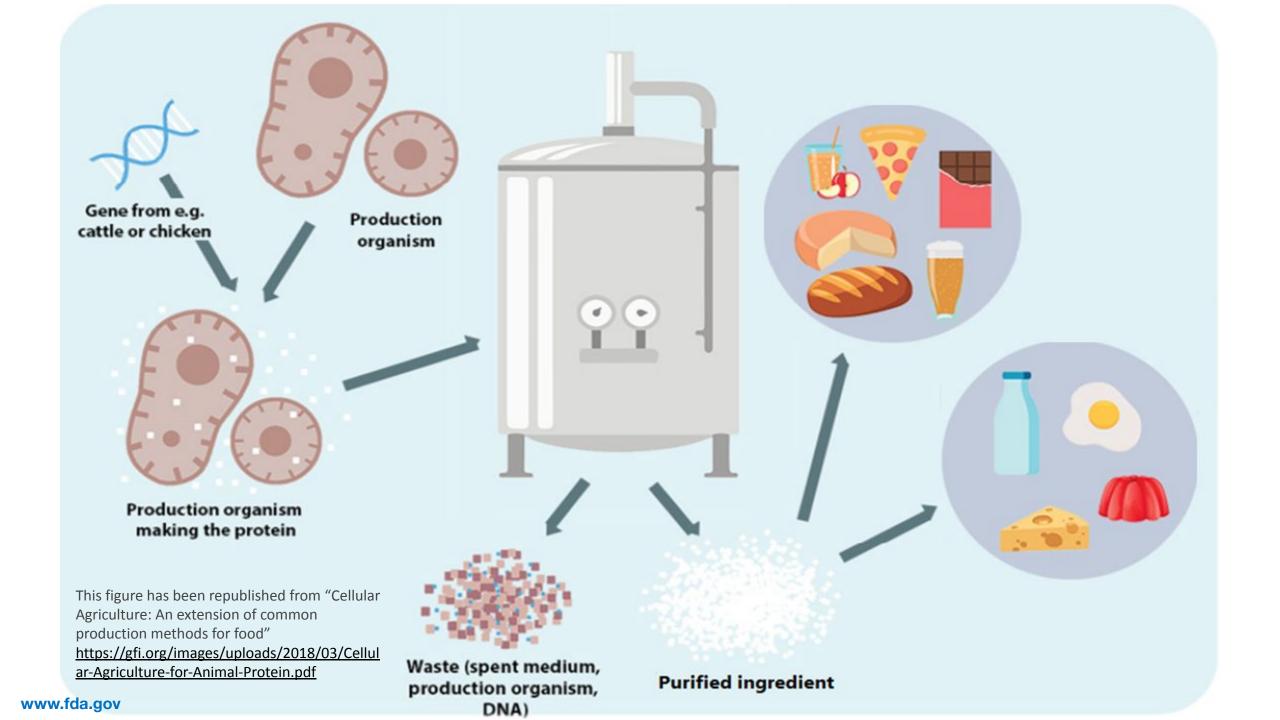
Food Additive

GRAS

- Availability: Publication in peer-reviewed scientific journals, text books, scientific reports etc.
- Acceptance: Consensus among qualified scientific experts regarding safety

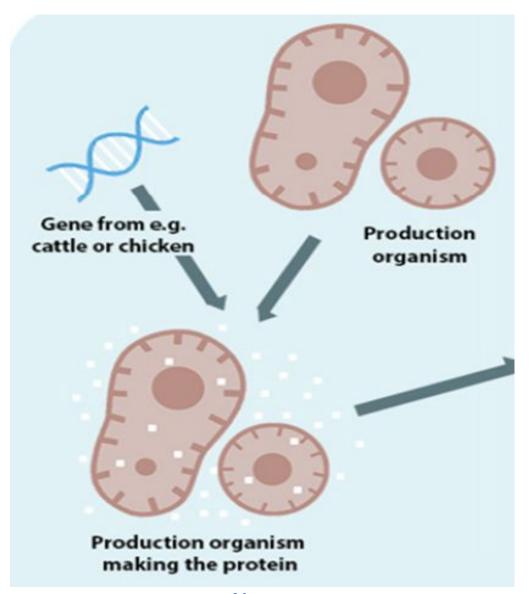


Safety Considerations for GRAS Notices Describing Uses of GE Microbe-Produced Ingredients



Safety Considerations

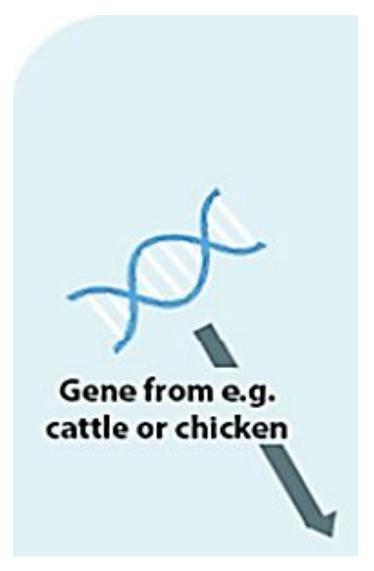




- Identification of production strain
 - Safe strain lineage
 - Pathogenicity of host strain
 - Whether the host strain is toxic (e.g., production of any toxigenic metabolites)
 - Antibiotic resistance profile
- Deposit designation (strongly recommended), or how the identity was confirmed
- Modifications made to production strain
 - How the strain was genetically engineered (e.g., construction of the production strain)

Safety Considerations, cont'd.

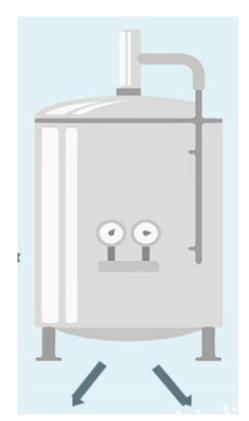




- Identification and function of inserted genetic sequences
 - Explicitly state what genetic material was inserted, and any extraneous DNA left behind
 - Introduction of new traits (genes) that yield additional by-products or impurities
 - Identification of any possible proteins produced, including a discussion on allergenicity
 - Stability of the introduced genetic sequences; including potential for transmission of genetic sequences
 - Confirmation of the identity of the inserted genetic sequences

Safety Considerations, cont'd.





 Whether any of the raw materials used in the fermentation media are major allergens or are derived from major allergens

Purified ingredient

Composition and purity of the final food ingredient, including presence/absence of production

 Intended target foods and use levels







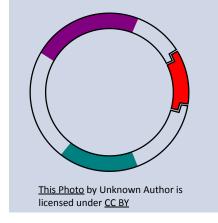
Examples

Enzymes



 Enzyme genes expressed by various production microorganisms during fermentation and recovered and purified











 Safety of: donor DNA, parent and production strains, fermentation product(s), manufacturing, and the enzyme itself



Algal Oils



Microalgae that produce oils enriched in unsaturated fatty acids







 Safety of: parent and production strains, microbial inactivation and product purification, and the product oil itself

Yeast



 Hops flavor biosynthetic enzyme genes from mint and basil plants expressed by yeast during fermentation of beer





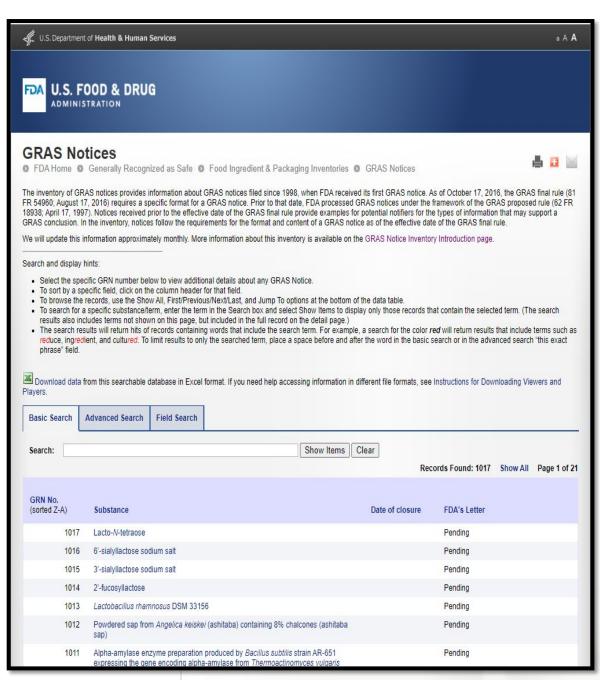


This Photo by Unknown Author is licensed under <u>CC BY-NC</u>

 Safety of: donor DNA, parent and production strains, manufacturing, and the hops flavor molecules produced

Conclusions

- DFI ensures that food ingredients are safe for their intended uses.
- FDA's GRAS Notification Program is transparent.
- We strongly encourage pre-submission meetings; request one at Premarkt@fda.hhs.gov.







Thank you!