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Subject: FSANZ: Applications and Submissions - Submission [SEC=INCONFIDENCE]
Attachments: AFGC submission on A1049 GM High Oleic Acid Soybean Line MON87705.pdf

Categories: Orange Category



FSANZ: Applications and Submissions - Submission

Friday, 25 March, 2011

- 1. Assessment Report Number:** A1049
- 2. Assessment Report Title:** Herbicide Tolerant High Oleic Acid Soybean Line MON87705
- 3. Organisation Name:** Australian Food and Grocery Council (AFGC)
- 4. Organisation Type:** Other
- 5. Representing:** Australian food manufacturing sector
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- 12. Submission Text:** see attached

Australian Food and Grocery Council **SUBMISSION**

28 MARCH 2011

TO:
FOOD STANDARDS AUSTRALIA NEW ZEALAND

IN RESPONSE TO:
**A1049 - FOOD FROM HERBICIDE-TOLERANT, HIGH OLEIC
ACID SOYBEAN LINE MON87705.**



Australian Food and Grocery Council

PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

Membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors. (A full list of members is included as Appendix A.)

AFGC's aim is for the Australian food, beverage and grocery manufacturing industry to be world-class, sustainable, socially-responsible and competing profitably domestically and overseas.

With an annual turnover of \$102 billion (see chart), Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector¹ is Australia's largest and most important manufacturing industry, four times larger than the automotive parts sector – the food and grocery manufacturing industry is a vital contributor to the wealth and health of our nation. Representing 28 per cent of total manufacturing turnover, the sector is comparable in size to the Australian mining sector.

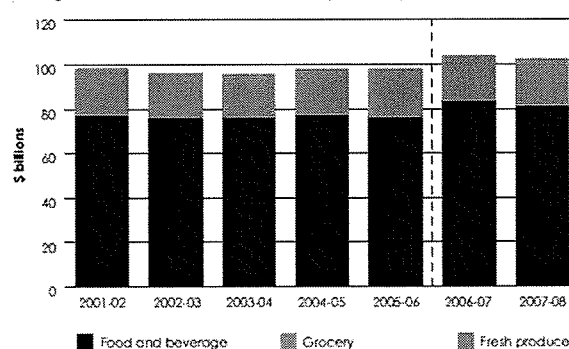
The industry's products are in more than 24 million meals, consumed by 22 million Australians every day, every week and every year. The food and grocery manufacturing sector employs more than 288,000 people representing about 3 per cent of all employed people in Australia paying around \$13 billion a year in salaries and wages.

The growing and sustainable industry is made up of 38,000 businesses and accounts for \$44 billion of the nation's international trade. The industry's total sales and service income in 2007-08 was \$102 billion and value-added increased to nearly \$27 billion². The industry spends about \$3.8 billion a year on capital investment and over \$500 million a year on research and development.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia³.

It is essential for 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.

Figure 1. Industries turnover (2007-8)



Source: ABS, catalogue number 8221.0 and 8159.0³

¹ Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc..

² AFGC and KMPG. *State of the Industry 2010*. Essential information: facts and figures. Australian Food and Grocery Council. Oct 2010.

³ About Australia: www.dfat.gov.au

1. INTRODUCTION

AFGC welcomes the opportunity to make this submission to the Food Standards Australia New Zealand in response to the assessment report for Application A1049 - Food from Herbicide-tolerant, High Oleic Acid Soybean Line MON87705.

AFGC notes the intent of this application is to amend Standard 1.5.2 – Food produced using Gene Technology, in the Australia New Zealand Food Standards Code, to permit the sale and use of food derived from GM soybean line MON87705, conferring herbicide-tolerance and with an altered fatty acid profile with increased oleic acid and reduced linolenic acid content.

The AFGC supports this application on the basis that there is no identified risk to public health and safety, and that it is then up to companies and individuals to make their own independent commercial decisions as to whether or not to use this product.

Recommendation

That FSANZ propose amending Table to clause 2 in Standard 1.5.2 – Food produced using Gene Technology to include food derived from *Herbicide-tolerant, High Oleic Acid Soybean Line MON87705*.

2. SPECIFIC COMMENTS

2.1. The Application

AFGC notes that the assessment report has considered the genetic modification used in this plant, the potential toxicity and allergenicity of the novel protein, and the comparison of the genetically modified plant with that of a conventional plant.

FSANZ did not identify any public health and safety concerns, and concluded that food derived from GM soybean line MON87705 is as safe and wholesome as the equivalent commercial counterpart. Naturally there are compositional differences of biological significance compared to conventional (non-GM) soybean cultivars, given the altered fatty acid profile to increase the oleic acid and reduce the linolenic acid content.

2.2. Consumer information

AFGC considers the current regulatory arrangements for foods derived from gene technology ("GM Foods"; Australian New Zealand Food Standards Code *Standard 1.5.2 Foods Produced using Gene Technology*) are appropriate to **ensure protection of public health and safety** and adequate information to consumers for informed choice.

The AFGC supports FSANZ assessment that food derived from MON87705 soybean would be required to be labelled as 'genetically modified', irrespective of whether novel DNA or protein are present in the final food because of the introduced changes in the fatty acid composition of MON87705 seeds.

The labelling of GM food is not a safety issue. It is solely related to the nature, extent and practicalities of providing information for informed consumer choice. The AFGC supports the recommendation that the general labelling requirements for GM foods, in addition to voluntary claim permissions relating to monounsaturated fatty acids, would provide consumers with adequate information on this product to enable an informed choice, and that there is no mandatory requirement to declare the altered fatty acid profile.

Membership as at 25 March 2011

Arnett's Biscuits Limited
Asia-Pacific Blending Corporation P/L
Barilla Australia Pty Ltd
Beak & Johnston Pty Ltd
Beechworth Honey Pty Ltd
Beerenberg Pty Ltd
Bickfords Australia
BOC Gases Australia Limited
Bronte Industries Pty Ltd
Bulla Dairy Foods
Bundaberg Brewed Drinks Pty Ltd
Bundaberg Sugar Limited
Byford Flour Mills T/a Millers Foods
Campbell's Soup Australia
Cantarella Bros Pty Ltd
Cerebos (Australia) Limited
Cheetham Salt Ltd
Christie Tea Pty Ltd
Church & Dwight (Australia) Pty Ltd
Clorox Australia Pty Ltd
Coca-Cola Amatil (Aust) Limited
Coca-Cola South Pacific Pty Ltd
Colgate-Palmolive Pty Ltd
Coopers Brewery Limited
Danisco Australia Pty Ltd
Devro Pty Ltd
DSM Food Specialties Australia Pty Ltd
Earlee Products
Eagle Boys Pizza
FPM Cereal Milling Systems Pty Ltd
Ferrero Australia
Fibrisol Services Australia Pty Ltd
Fonterra Brands (Australia) Pty Ltd
Food Spectrum Group
Foster's Group Limited
Fruco Beverages (Australia)
General Mills Australia Pty Ltd
George Weston Foods Limited
GlaxoSmithKline Consumer Healthcare
Go Natural
Goodman Fielder Limited
Gourmet Food Holdings
H J Heinz Company Australia Limited
Harvest FreshCuts Pty Ltd
Healthy Snacks
Hela Schwarz
Hoyt Food Manufacturing Industries P/L
Hungry Jack's Australia
Jalna Dairy Foods Pty Ltd
Johnson & Johnson Pacific Pty Ltd
Kellogg (Australia) Pty Ltd
Kerry Ingredients Australia Pty Ltd

Kimberly-Clark Australia Pty Ltd
Kraft Foods Asia Pacific
Laucke Flour Mills
Lion Nathan National Foods Limited
Madura Tea Estates
Manildra Harwood Sugars
Mars Australia
McCain Foods (Aust) Pty Ltd
McCormick Foods Aust. Pty Ltd
McDonald's Australia
Merisant Manufacturing Aust. Pty Ltd
Nerada Tea Pty Ltd
Nestlé Australia Limited
Nutricia Australia Pty Ltd
Ocean Spray International Inc
Parmalat Australia Limited
Patties Foods Pty Ltd
Procter & Gamble Australia Pty Ltd
Queen Fine Foods Pty Ltd
QSR Holdings
Reckitt Benckiser (Aust) Pty Ltd
Safcol Canning Pty Ltd
Sanitarium Health Food Company
Sara Lee Australia
SCA Hygiene Australasia
Schweppes Australia
Sensient Technologies
Simplot Australia Pty Ltd
Spicemasters of Australia Pty Ltd
Stuart Alexander & Co Pty Ltd
Subway
Sugar Australia Pty Ltd
SunRice
Swift Australia Pty Ltd
Tasmanian Flour Mills Pty Ltd
Tate & Lyle ANZ
The Smith's Snackfood Co.
The Wrigley Company
Tixana Pty Ltd
Unilever Australasia
Vital Health Foods (Australia) Pty Ltd
Ward McKenzie Pty Ltd
Wyeth Australia Pty Ltd
Yakult Australia Pty Ltd
Yum Restaurants International

Associate & *Affiliate Members

Accenture
Australian Pork Limited
ACI Operations Pty Ltd
Amcor Fibre Packaging
*ASMI

AT Kearney
BRI Australia Pty Ltd
*Baking Association Australia
CAS Systems of Australia
CHEP Asia-Pacific
CSIRO Food and Nutritional Sciences
CoreProcess (Australia) Pty Ltd
CROSSMARK Asia Pacific
Dairy Australia
Food Liaison Pty Ltd
FoodLegal
*Foodservice Suppliers Ass. Aust.
*Food industry Association QLD
*Food industry Association WA
Foodbank Australia Limited
*Go Grains Health & Nutrition Ltd
Grant Thornton
GS1
Harris Smith
IBM Business Cons Svcs
innovations & solutions
KN3W Ideas Pty Ltd
KPMG
Leadership Solutions
Legal Finesse
Linfox Australia Pty Ltd
Logan Office of Economic Dev.
Meat and Livestock Australia Limited
Monsanto Australia Limited
New Zealand Trade and Enterprise
RQA Asia Pacific
StayinFront Group Australia
Strikeforce Alliance
Swire Cold Storage
Swisslog Australia Pty Ltd
The Food Group Australia
The Nielsen Company
Touchstone Cons. Australia Pty Ltd
Valesco Consulting FZE
Visy Pak
Wiley & Co Pty Ltd

PSF Members

Amcor Packaging Australia
Bundaberg Brewed Drinks Pty Ltd
Schweppes Australia Pty Ltd
Coca-Cola Amatil (Aust) Limited
Foster's Group Limited
Golden Circle Limited
Lion Nathan Limited
Owens Illinois
Visy Pak

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