

6 December 2012

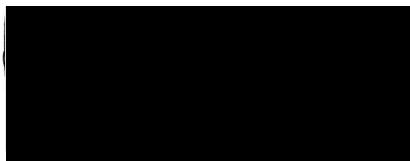
Manager
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the Call for Submissions for **Application A1073** *Food derived from Herbicide-tolerant Soybean Line DAS-44406-6*.

Yours sincerely



Katherine Rich
Chief Executive

Food Standards Australia New Zealand
**APPLICATION A1073 FOOD DERIVED FROM HERBICIDE-
 TOLERANT SOYBEAN LINE DAS-44406-6**

Call for Submissions

6 December 2012

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to make a submission on *Application A1073 Food derived from Herbicide-tolerant Soybean Line DAS-44406-6*.

New Zealand Food & Grocery Council

The NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. Collectively this sector generates \$28.7 billion in the New Zealand domestic retail food, beverage and grocery products market and \$26.3 billion in export revenue from exports to 183 countries. Food and beverage manufacturing is the largest manufacturing sector in New Zealand representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages.

Food and beverage manufacturing and wholesaling in New Zealand directly employs 104,160 people (5% total employment) and, when taking the wider food and beverage value chain (including farming and food retailing/foodservice) into account, employment soars to 344,820 in 85,252 enterprises. This represents around one in five people employed in our country.

No matter how you look at it, the New Zealand food, beverage and grocery sector makes a substantial contribution to the New Zealand domestic economy, to our exports and to the general economic well-being of the country.

Application A1073

The NZFGC understands that the Soybean Line DAS-44406-6 is tolerant to the herbicides 2,4-D, glufosinate ammonium and glyphosate and that tolerance is achieved through the introduction of the *aad-12* gene, from the soil bacterium *Delftia acidovorans*, the *pat* gene from the soil bacterium *Streptomyces viridochromogenes* and the *2m epsps* gene from *Zea mays* (corn). NZFGC understands that the PAT and EPSPS proteins have been widely used to confer herbicide tolerance in a range of GM crop species that have previously been found to be safe as foods and that have been included in the Australia New Zealand Food Standards Code. As well, the AAD-12 protein was last assessed by FSANZ in Application A1046 for Soybean Line DAS-68416-4 during the period Feb-Oct 2011.

Comments

The Australia New Zealand Food Standards Code contains, in Standard 1.5.2, the references to eight previously approved herbicide-tolerant soybean lines. Half of those have been approved in the past two years (2010-11).

The unique feature of the genetic modification in DAS-44406-6 compared to other approved herbicide-tolerant soybean lines is that it is intending to be tolerant to three types of herbicides rather than one or two. For this, the genetic modification appears more complex although it brings together aspects of previously approved modifications.

The safety assessment of Soybean Line DAS-44406-6 conducted by Food Standards Australia New Zealand (FSANZ) included consideration of the following key elements:

- an analysis of the molecular characterisation of the genetic material introduced into the host soybean genome
- the characterisation of the novel proteins including the function, phenotypic effects and the potential toxicity and allergenicity of the 2m EPSPS, AAD-12 and PAT proteins
- risk of production of herbicide metabolites
- detailed compositional analyses
- nutritional impact
- evaluation of intended and unintended changes.

The FSANZ assessment of Soybean Line DAS-44406-6 was restricted to food safety and nutritional issues.

FSANZ did not identify any potential public health and safety concerns with DAS-44406-6.

The NZFGC notes that the applicants made a submission to the US Food and Drug Administration in September 2011 and that applications have been submitted to Argentina, Canada, Korea, the EU and Switzerland. No results from these applications are recorded. In the case of Canada however, no novel foods are reported as having been approved since April 2011.

The NZFGC supports choice in the market place and for manufacturers. The NZFGC also notes that all safety assessment reports of GM products are independently peer reviewed. On this basis, NZFGC therefore supports the approval of DAS-44406-6. This does not infer its use in New Zealand nor is this intended to influence the current process for environmental release of GM organisms in New Zealand which is an entirely separate process.