

31 January 2014

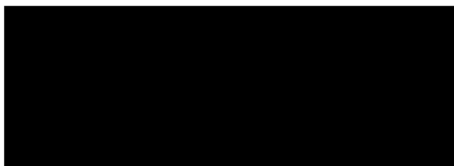
Manager
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the Call for Submissions for **Application A1089 Food derived from Herbicide-tolerant Canola Line DP-073496-4**.

Yours sincerely



Katherine Rich
Chief Executive

Food Standards Australia New Zealand
APPLICATION A1089 FOOD DERIVED FROM HERBICIDE-
TOLERANT CANOLA LINE DP-073496-4

Call for Submissions

31 January 2014

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to make a submission on *Application A1089 Food derived from Herbicide-tolerant Canola Line DP-073496-4*.

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 over \$28 billion in the New Zealand domestic retail food, beverage and grocery products market and over \$26 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 over 100,000 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 almost 350,000 in over 85,000 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 A1089

The NZFGC understands that the canola line DP-073496-4 is tolerant to the herbicide glyphosate. The tolerance is achieved through the introduction of *gat4621* (Glyphosate AcetylTransferase), a gene constructed from native gene sequences from the bacterial species, *Bacillus licheniformis*. Tolerance is achieved through the inactivation of the herbicide by the GAT4621 enzyme, a protein that has been used to confer tolerance in two previously assessed foods (soybean line DP-356043-5 and corn line DP-098140-6). The canola line is approved for use in Canada, USA and Mexico and application has been made for its use in Japan (2013), Korea (2012) and the European Union (2012).

Comments

The safety assessment of canola line DP-073496-4 conducted by Food Standards Australia New Zealand (FSANZ) included consideration of the following key elements:

- history of use – rapeseed is the second largest oilseed crop in the world behind soybean and canola seeds are processed into two major products, oil and meal. The oil is the major product for human consumption with global canola oil consumption third behind soybean and palm oil
- molecular characterisation of the inserted novel genes and inter-generational stability
- characterisation of the novel protein expressed by the canola line (GAT4621). It exhibited the expected functional enzyme activity and as determined in previous assessments of this protein, “the evidence supports the conclusion that GAT4621 is unlikely to be toxic or allergenic in humans” (Supporting Document 1, pii and ..)
- herbicide metabolites to ensure that spraying the genetically modified canola line would not result in the production of novel herbicide metabolites that are not already present in conventional crops
- detailed compositional analyses to ensure nutritional adequacy of the canola seed and that levels of several components (including fibre, fatty acids, vitamins, minerals and anti-nutrients (glucosinolates, phytic acid, sinapine and tannins)). While a small number of ‘statistically significant differences’ were found in individual seed analytes between the canola line and the control, these differences were attributes to agricultural conditions over several sites
- nutritional impact to ensure there was no significant nutritional impact of acetylsed amino acids (caused by the expression of GAT4621) in the diet.

The FSANZ assessment of canola line DP-073496-4 was restricted to food safety and nutritional issues. FSANZ did not identify any potential public health and safety concerns with the canola line.

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 canola line DP-073496-4. 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.