

Application A1138

Food derived from Provitamin A Rice Line GR23

General Procedure

Submission

The NSW Food Authority (Food Authority) appreciates the stated purpose of the application is to prevent trade disruption should GR2E rice be inadvertently present in imported shipments of milled rice provided to Australia.

The Food Authority further notes that G2RE rice is not intended for use in Australian or New Zealand food supplies.

However, as the genetic modification introduced to G2RE rice intentionally increases Vitamin A content, the Food Authority considers a policy question concerning the application of biofortification to Australian and New Zealand food supplies should be referred to the Food Regulation Standing Committee (FRSC) and, if necessary, Food Ministers for consideration.

The Food Authority notes citation of the 2003 consultation paper for the development of the Policy Guideline *Fortification of Food with Vitamins and Minerals* (the Policy Guideline) in the assessment of A 1138. However, the Guideline itself does not provide this express exclusion. The Policy Guideline expressly describes matters that it does not apply to (e.g. therapeutic goods, foods considered by Part 2.9 of the Australia New Zealand Food Standards Code), but does specifically state that it applies to new applications and proposals.

The Food Authority also notes this Policy Guideline was amended in 2009 to specify that permission to fortify should not promote increased consumption of foods with little or no nutritional value and that have no other demonstrated health benefits.

A further statement of clarification concerning the Policy Guideline was issued in November 2015.

It is proposed that A 1138 be referred to FRSC for policy consideration with a possible request to activate s109 (9) of the *Food Standards Australia New Zealand Act 1991* concerning 'stopping the clock' for A 1139 while policy questions are investigated.

The Food Authority notes that the amount of additional Vitamin A provided is not adequate to cause health and safety concerns.

ENDS

The views expressed in this submission may or may not accord with those of other NSW Government agencies. The NSW Food Authority has a policy which encourages the full range of NSW agency views to be submitted during the standards development stages before final assessment. Other relevant NSW Government agencies are aware of and agree with this policy.