



14 September 2017

Project Officer Application A1138  
Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
WELLINGTON 6036

Dear Sir/Madam

**Application A1138 – Food derived from Provitamin A Rice Line GR2E – Call for Submissions**

Thank you for the opportunity to comment on this application. The Ministry for Primary Industries (MPI) supports option 1, that is to prepare a draft variation to Schedule 26.

We note that GR2E rice is designed to mitigate vitamin A deficiency in developing countries, and as such the purpose of the application is to prevent trade disruption should GR2E rice be inadvertently present in imported rice. The rice is not intended for sale in Australia and New Zealand.

MPI has the following comments to make.

Labelling

MPI supports the proposed approach. We agree that it should not be an additional requirement to specify the nature of the altered characteristics, in association with the words 'genetically modified' (where required). We agree with the reasons set out in section 2.2.1.2 of the Call for Submissions report, in particular that it could be misleading to label the rice as containing higher levels of beta-carotene (and to a lesser extent, other forms of provitamin A), when the levels are not nutritionally significant.

If this GM rice were to be sold in New Zealand or Australia as a food, it is our understanding that additional labelling would be required, to indicate to true nature of the food (standard 1.2.4—4 applies). The NIP should also reflect the altered provitamin A content. This point could be included in the Approval Report, for future reference.

### Policy Guideline – Fortification of Food with Vitamins and Minerals

We have considered the FSANZ response to the applicability of any policy guidelines relevant to the application. We note that in developing the Policy Guideline *Fortification of Food with Vitamins and Minerals*, the FRSC consultation paper noted that fortification through genetic means was explicitly deemed to be beyond the scope of the (consultation) paper. We note however that the Policy Guideline itself does not explicitly exclude fortification by genetic means.

However, despite this, it our view that the approval of the application is not inconsistent with the Policy Guideline, as the rice has been developed to address a nutritional deficiency in another population, and is not intended as a food source for the Australia and New Zealand population. Our view on this would need to be reconsidered, if the rice was ever intended to be a food in Australia and New Zealand.

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The issue of biofortification is currently being considered by the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU), for the intended purpose of appropriate labelling of foods that have been biofortified. The definition of biofortification is under discussion, where the concept of nutrient addition prior to processing, for the intent of a health benefit/ addressing a nutrient inadequacy, is being addressed.

### Safety Assessment

We agree with FSANZ that no potential public health and safety concerns have been identified.

The dietary modelling assumes the replacement of all rice in our diets with GR2E rice, and is therefore conservative. Even with this assumption, the increase in the intakes of beta-carotene is considered small and would not pose any adverse health concern.

Yours sincerely

  
 Jenny Reid  
**Manager Food Science and Risk Assessment**