

7 July 2017

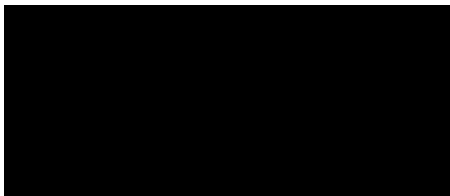
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on ***Call for Submissions – Application A1139 : Food derived from Potato Lines F10, J3, W8, X17 & Y9***

Yours sincerely



Katherine Rich
Chief Executive



***Call for Submissions – Application A1139 :
Food derived from Potato Lines F10, J3, W8,
X17 & Y9***

Submission by the New Zealand Food & Grocery Council

7 July 2017

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the *Call for Submissions – Application A1139 : Food derived from Potato Lines F10, J3, W8, X17 & Y9*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

THE APPLICATION

3. The application seeks approval for the sale of food derived from potatoes that have disease resistance to foliar late blight, reduced blackspot bruising and reduced acrylamide potential. Six potato lines were generated from a two-step transformation process using three common potato varieties (Russet Burbank, Ranger Russet and Atlantic).
4. Initially, three lines (E56, F10 and J3) were generated using an RNA interference (RNAi) approach by inserting DNA fragments from each of specific target genes. Reducing the expression of the target genes was expected to result in a reduction in the levels of free asparagine and reducing sugars in the tuber which can react to produce acrylamide. Similarly, a reduction of polyphenols would decrease the formation of pigmented products that occur with bruising and can result in food wastage. A second transformation procedure was performed on E56, F10 and J3 to create W8, X17 and Y9 respectively to further decrease the levels of reducing sugars and thus the acrylamide potential of the tubers.

COMMENTS

5. NZFGC is particularly supportive of efforts to reduce the prospect of acrylamide forming and to reduce food waste. We note that the assessment of E56 did not proceed because of limited supporting data but that the safety assessment of W8, X17 and Y9, and the progenitor lines F10 and J3 concluded that there were no potential public health and safety concerns identified.
6. The FSANZ safety assessment of the potato lines W8, X17, Y9, F10 and J3 was restricted to human food safety and nutritional issues and included consideration of the following key elements:
 - a characterisation of the transferred genetic material, its origin, function and stability in the potato genome
 - the changes at the level of DNA and RNA in the whole food
 - detailed compositional analyses
 - evaluation of intended and unintended changes.
7. The compositional analysis performed on W8, X17, Y9, F10 and J3 was to establish the nutritional adequacy of tubers produced from these lines and to characterise any unintended compositional change. Analyses were done on a range of nutrients and anti-nutrients (glycoalkaloids). FSANZ notes that even with the intended changes to sucrose, reducing sugars and asparagine, the levels of all analytes fell within the natural

variation found across the range of conventional potato lines used for human consumption.

8. The conclusion that no potential public health and safety concerns were identified has meant that the benefits of these potato lines entering the food system outweighs any costs involved. NZFGC notes that labelling requirements associated with genetically modified products would continue to be required if novel DNA and/or novel protein is present in any subsequent food product using these potato lines.
9. We note that applications for approval of potato lines W8, X17, Y9, F10 and J3 have been made to relevant food authorities in Canada and the USA. All have been approved as a food in the USA and lines F10 and J3 in Canada while the remaining lines are still under review in Canada as foods.
10. NZFGC supports choice in the market place and for manufacturers and note that all safety assessment reports of GM products prepared by FSANZ are independently reviewed. On this basis, NZFGC supports the approval of MS11. This does not infer its use in New Zealand nor is this intended to influence any process for environmental release of GM organisms in New Zealand which is an entirely separate process.