

## Coughlan, Christine

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**From:** Clare Swinney [REDACTED]  
**Sent:** Sunday, 2 July 2017 10:56 AM  
**To:** submissions  
**Subject:** Submission To FSANZ Application A 1139  
  
**Categories:** chris

From: Clare Swinney and Jim Reece



To Whom It May Concern,  
**Re: Application A1139 - Food derived from Potato Lines E56, F10, J3, W8, X17 & Y9.**

We object strongly to FSANZ approving application A1139 - Food derived from Potato Lines E56, F10, J3, W8, X17 & Y9 and we ask that FSANZ declines this application. There is no comprehensive data showing evidence of unintended effects of the transgenic potato lines. It makes it mandatory for FSANZ to decline the approval.

It is necessary for FSANZ to require whole genome sequencing to identify off-target mutations and also essential to ascertain the effects of unintended changes on global patterns of gene function.

FSANZ must require sequencing using molecular profiling analyses or “omics”-

- transcriptomics — gene expression profiling,
- proteomics — protein composition profiling,
- metabolomics — profiling of metabolites,
- miR-omics – microRNA profiling

The best evidence available for effective safety assessment also requires long-term toxicity studies in established animal model systems. In the absence of these data to inform FSANZ, there can be no legal approval of A1139

The APHIS documentation shows that these GE potato lines offer no nutritional advantage, as there are non-GE potato varieties that are naturally low in the desired profiles. This demonstrates that there is no need for approval of the GE potatoes.

Instead of approving this application, FSANZ could instead recommend non-GE potato varieties that have naturally-occurring low levels of compounds responsible for

acrylamide production. They could also educate food businesses on storing and cooking procedures that minimize acrylamide production..

The FSANZ assessment is compromised with respect to rigorous scientific procedure. These GE potato lines cannot be approved for human or animal consumption, without the provision of comprehensive information regarding compositional differences to their non-GE counterparts. Compositional analyses are very limited in that they can only assay for known compounds. Any novel compounds would not be detected in such analyses.

FSANZ must provide evidence of safety, when eaten, in the lines that have significant variations in nutrients, or more importantly anti-nutrients. Anti nutrients such as glycoalkaloids can be highly toxic for consumers.

The afore-mentioned studies have not been carried out and in their absence, there should be no legal approval of the A1139 application.

Yours sincerely,

Clare Swinney and Jim Reece