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From: Kerikeri Organic <organics@value.net.nz>
Sent: Friday, 7 July 2017 5:07 PM
To: submissions
Cc: [REDACTED]
Subject: RE: GE Free Northland submission opposing Application A1139 (GE potatoes)

Categories: [REDACTED]

Submission to Food Standards Australia NZ (FSANZ)

Regarding: Application A 1139

Submission lodged by:

Martin Robinson

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I strongly oppose the application and ask FSANZ to decline approval of A1139 - Food derived from Potato Lines E56, F10, J3, W8, X17 & Y9 in their entirety.

I fully endorse the GE-Free Northland submission in its entirety and resubmit it as my own

I work constructively with all Northland territorial authorities, the Northland Regional Council, Taitokerau and Auckland mana whenua, Northland Conservation Board and various other organisations as well as Landcare groups to protect our existing valuable GM free status...to protect our biosecurity, unique biodiversity, conventional, IPM and organic primary producers, our economy and the public health from the risks/ adverse impacts of outdoor use of GMOs.

I also support comprehensive GE labelling of all imported foodstuffs to protect "consumer right to know" and traceability. I oppose the use of risky imported GE ingredients into our food chain. I work to protect the public health and our food sovereignty.

I represent our members' and supporters' concerns around the risks and regulation of GMOs since the late 1990's as industry and regulatory authorities have sought to push risky GE foods into the New Zealand food chain.

I support NZ's existing Zero Tolerance Policy for any GE content in imported seeds, including adventitious presence.

I support the precautionary and prohibitive GE policies of all Taitokerau Iwi authorities for their respective rohe. I support the innovative work of all the member councils of the Northland/ Auckland "Inter Council Working Party on GMO Risk Evaluation & Management Options", working to create an additional (much needed) tier of local protection against the risks of outdoor use of GMOs. I work to keep unwanted new organisms (GMO and otherwise) out of Taitokerau and Auckland region.

I applaud the efforts of various NZ councils to put in place a much-needed additional tier of local protection against the risks of outdoor use of GMOs to their regions biosecurity, GE free primary producers, economy, environment, and food sovereignty.

I recommend that this particular application (GE potatoes) not be approved. We submit FSANZ cannot approve the GE potatoes in the application without a serious breach of its duty of care as well as the principles outlined in its mission statement.

The systems and processes currently used to approve this (and previous similar applications) are not fit for purpose as they lack the rigour and comprehensive data needed to make a genuine and credible safety assessment.

As industry and regulatory authorities have sought to push GMO foods into the New Zealand food chain GE Free Northland has sought to protect consumer choice to avoid GM food, and proper independent testing and monitoring of such risky, novel foods.

The application fails on these and other counts and we ask that the application not be approved.

The systems and processes used to assess safety, and to approve and monitor labelling compliance of this (and previous similar applications) are failing or not fit for purpose.

Latest scientific understanding shows they lack the rigor and comprehensive data needed to make a genuine and credible safety assessment. To continue with an approval in knowledge of this would be unethical.

The lack of labeling requirements at likely sales channels for these GMO products, is a serious breach of choice for consumers.

The lack of mandatory labelling for food sold by restaurants, takeaway bars and dairies is likely to lead to deception and unconsensual consumption of GE potatoes by consumers. The lack of enforcement and monitoring of compliance in GM food labelling by FSANZ is remiss and approval of the application would add to this, and be against the public interest.

In the absence of long term feeding studies and 'omic' analysis that have been identified as necessary and best practice by independent experts, to understand the changes and potential implications for food safety, FSANZ is erring by making a decision based on assumptions and inadequate data.

In the absence of full data it is not possible for FSANZ to support the claims made by the applicant.

FSANZ should know that there are unexpected off-target effects resulting from genetic engineering, including from much hyped 'accurate and precise' recent advances using CRISPR.

The complexity of unexpected risk is made clear by recent [study in mice](#), which found that the large numbers of off-target mutations caused by CRISPR in mice could not be predicted by the usual computer algorithms.

Schaefer KA, Wu W-H, Colgan DF, Tsang SH, Bassuk AG, Mahajan VB. Unexpected mutations after CRISPR-Cas9 editing in vivo. Nat Methods. 2017;14(6):547-548. doi:10.1038/nmeth.4293.

<https://www.nature.com/nmeth/journal/v14/n6/full/nmeth.4293.html>

FSANZ is in error by relying on the inadequate data and claims of the applicant. Independent scientific comment highlights that the data available for assessment by FSANZ is inadequate for any approval to be legitimate or to meet FSANZ's legislated responsibility.

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.

Also required is sequencing using other molecular profiling analyses : “omics”-transcriptomics — gene expression profiling, proteomics — protein composition profiling, metabolomics — profiling of metabolites, and miR-omics – microRNA profiling.

It is necessary for FSANZ to require long-term toxicity studies in established animal model systems. The compositional alterations in these and other food products produced with Genetic Engineering will not be fully revealed by the molecular profiling methods due to the current inherent limitations of these techniques.

In the absence of these data to inform FSANZ, there can be no legitimate approval of the application.

There is also a significant biosecurity risk and potential threat to local growers and exporters arising from these GMO potatoes.

Contamination of conventional food by GMO elements has led to loss of exports and economic harm in the past and continues to be an economic threat that FSANZ fail to properly address.

It is illegal to import viable genetically modified plants into New Zealand. Even parts of non-whole tubers can be viable and thus endanger the New Zealand biosecurity status. It would be illegal to approve any living, viable GE potatoes into the country.

I ask FSANZ to recognise and respond to the public concern and to support the public interest, consumer "right to know", and traceability by not approving the GE potato application.

Please keep me informed. I wish to be heard and have the right to present supplementary information.

I support the more substantive submissions by Physicians & Scientists for Global Responsibility Charitable Trust (PSGR) NZ, and the Soil & Health Association Aotearoa NZ/ GE FREE NZ.