

SUBMISSION TO FOOD STANDARDS AUSTRALIA NEW ZEALAND RE APPLICATION A 1139

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SUBMISSION:

I SUBMIT THAT FSANZ (Food Standards Australia New Zealand) should decline the approval of Application A1139 – Food derived from potato lines E56, F10, J3, W8, X17 & Y9 for the following reasons:

1. There is no comprehensive data showing evidence of unintended effects of the transgenic potato lines which raises questions of SAFETY.
2. FSANZ has not undertaken whole genome sequencing to identify off-target mutations which is also essential to ascertain the effects of unintended changes on patterns of gene function in potatoes around the world.
3. FSANZ must require sequencing using molecular profiling analyses or “omics”, i.e. transcriptomics – gene expression profiling, proteomics – protein composition profiling, metabolomics – profiling of metabolites and miR-omics – microRNA profiling.
4. Effective safety assessment also requires long term toxicity studies in established animal model systems. In the absence of these to inform FSANZ there can be no legal approval of Application A1139.
5. 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 the approval of the GE potatoes to go ahead and no market for them.

6. An alternative available to FSANZ to approving this application would be to recommend non-GE potato varieties that have naturally occurring low levels of compounds responsible for acrylamide production and they could also educate food businesses on storing and cooking procedures that minimise acrylamide production.
7. There is no consumer benefit or nutritional benefit from the GE potatoes listed in this application compared to existing potato varieties and thus the RISK is high to both the economy and the consumer if they were to be approved.
8. Whole or even very small parts of any uncooked(raw) tubers endanger New Zealand's BIOSECURITY! The possibility of them establishing themselves as wild populations such as has happened in the U.S.A. with GE weeds is high.
9. Approval of the application would constitute a total disregard for the health of consumers by denying them their right to know what they are eating. There is no requirement at present for GE foods to be labelled as such and thus the public would be left in the dark and unwilling and unwitting consumers of GE potatoes which is also HIGHLY DISRESPECTFUL!
10. The GE potato lines' compositions are significantly different to their parent line which shows that the GE process has disrupted the cellular metabolism. As there are no feeding studies to evaluate these effects it is not possible to conclude that there are no biologically relevant differences – thus the food could cause untoward effects in consumers who could be exposed to unsafe food and used as GUINEAPIGS!

Yours sincerely,

Margaret Aylward

Date: 30 July 2017