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President

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Food Standards Australia and New Zealand
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Sent via: NBTConsultSubmissions@foodstandards.gov.au

To whom it may concern,

NSW Farmers is grateful for the opportunity to provide a submission to the Food Standards Australia and New Zealand (FSANZ) consultation on *Food derived using new breeding techniques*.

NSW Farmers supports the current FSANZ labelling system for food derived from gene technology. This ensures that food with a presence of modified genes is labelled as such and that it is compulsory to label food derived from or made with genetic modification technology.

We note that it is important to ensure regulation is commensurate with risks posed by final products rather than specific technologies and suggest that a process-based regulatory trigger may no longer be appropriate. As noted by CropLife in its submission to the consultation:

Food derived from plant varieties developed through the latest breeding methods should not be differentially regulated based on the techniques employed during the plant's development if they are similar to, or indistinguishable from foods that could have been produced using plants developed through earlier breeding methods.

Regarding null segregants, we do not consider these organisms to fall into the category of genetically modified (GM) foods and submit that they should not be labelled as such, particularly as they are not considered to be GM organisms by the Office of the Gene Technology Regulator. For detailed information we refer to CropLife's submission.

In terms of other issues for consideration, we recognise that the issue of products derived from animals raised on GM feed is of concern to some stakeholders and may be raised in consultation. We submit that current commercial animal products do not demonstrate changes in genetic composition that would require additional labelling. NSW Farmers notes the following from the SAFEMEAT Biotechnology Policy 2014, developed by red meat industry bodies:

Livestock feeds such as GM corn and GM soy have been compared with conventional feeds to measure any changes in feed composition. The research shows that levels of nutrients ... are substantially equivalent in GM and conventional feeds.

The Federation of Animal Science Societies ... has concluded that:

- *"The safety of meat, milk and eggs is assured by the science-based risk assessment procedures used by government agencies and developers;*

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- *The DNA introduced in GM plants and the proteins encoded by this DNA have not been detected in the meat, milk or eggs from animal fed this products; and*
- *Meat, milk and eggs from animals fed GM feeds are safe for human consumption”.*

Hundreds of peer reviewed feeding studies have been conducted with numerous animals ... with the vast majority, some of which have spanned multiple generations, showing no detrimental impacts from the consumption of the available GM crops. In addition, no differences in the composition of animal products including meat, milk and eggs, have been observed between animal fed conventional and those feed GM crops.

NSW Farmers thanks FSANZ for the opportunity to provide comment on *Food derived using new breeding techniques*. If you would like to further discuss any of the issues raised in this letter, please contact Alexandra Bunton, Senior Policy Advisor, on 02 9478 1020 or at buntona@nswfarmers.org.au.

Yours sincerely,



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