

Seamons, Colleen

From: Emma Burchell [technical@chc.org.au]
Sent: Tuesday, 19 April 2011 4:30 PM
To: submissions
Cc: Kristy Tomas
Subject: CHC submission Application A1042 Food derived from herbicide tolerant corn line
Attachments: CHC Submission Food derived from herbicide-tolerant Corn line 19 April 2011.pdf

Dear Standards Management officer,

Please find attached the Complementary Healthcare Council's submission in relation to Application A1042, Food derived from herbicide tolerant corn line.

If you have any questions about the submission, please do not hesitate to contact me,

Kind regards,

Emma Burchell | BHSc(Complementary Medicine) | ND(Adv) | Technical Officer | Complementary Healthcare Council of Australia
Sustainable health, enhanced wellness...naturally

PO Box 104 Deakin West ACT 2600 | Tel: +61 (0)2 6260 4022 | Mobile: 0451 681 663 | Fax: +61 (0)2 6260 4122
Email: technical@chc.org.au | Website: www.chc.org.au

Latest CHC Events

CHC Annual Industry Leaders' Parliamentary Reception

Join us for the annual CHC policy event on May 25

Parliament House, Canberra

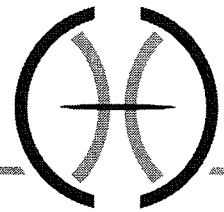
Members Only

Further information will be available in due course. Please contact Sophie Dimmock with any queries on events@chc.org



Please think of the environment before printing this email.

This e-mail (including any attachments) is intended only for the recipient(s) named above. It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person. If you are not a named recipient, please contact the sender and delete the e-mail from your system. Any views expressed in this E-mail are those of the individual sender, except where stated otherwise. Whilst this communication is believed to be free of any virus or defect which may affect a computer or IT system into which it is received and opened, it is the responsibility of the recipient to ensure this.



Food Standards Australia New Zealand
PO Box 7186
CANBERRA ACT 2610
AUSTRALIA

19 April 2011

Dear Sir/Madam,

CHC Submission – Application A1042 food derived from herbicide-tolerant corn line das-40278-9 (2nd assessment report)

Thank you for providing the opportunity for the complementary healthcare industry to comment on the above consultation paper dated 7 April 2011.

The Complementary Healthcare Council (CHC) is the leading expert association exclusively committed to a vital and sustainable complementary healthcare products industry. The CHC is unique in representing all stakeholder groups in industry including exporters/importers, manufacturers, raw material suppliers, wholesalers, distributors, direct marketers, retailers, practitioners, consultants and consumers.

The CHC is the principal reference point for members, government, the media, and consumers to communicate about issues relating to the complementary healthcare industry.

General Comments

- The CHC generally supports the application for GM herbicide-tolerant corn, providing adequate labelling provisions are established to ensure consumers can make informed choices when purchasing food products. This concern can be addressed by the objective set out in paragraph 18(1)(b) of the *FSANZ Act*; that is, the provision of adequate information relating to food to enable consumers to make informed choices.
- The Application states that food derived from corn line DAS-40278-9 would be required to be labelled as genetically modified if it contains novel DNA or novel protein.
- The CHC suggest that the labelling provisions extend to 'would be required to be labelled as genetically modified **irrespective of whether novel DNA or protein are present in the final food.** That is food derived from corn line DAS-40278-9 will be required in the ingredients list or in conjunction with the name of the food.
- In monitoring compliance to the labelling provisions, the CHC notes that the cost of resourcing this would be comparable whether or not the GM food is approved i.e. the labelling provisions should not be costly and therefore prohibitive to implement.
- Lastly, the CHC notes that the cultivation of any GM crop in Australia and New Zealand could have an impact on the environment. As stated in the consultation paper, there is no intention to apply for approval to cultivate corn line DAS-40278-9 in either Australia or New Zealand.

- The CHC encourages a sustainable complementary food products industry and as such does not support any restrictions to international trade on corn.

If you would like to discuss any of the matters raised in this submission, please do not hesitate in contacting me further.

A handwritten signature in black ink, appearing to read 'K. Tomas'.

Kristy Tomas
Scientific & Regulatory Affairs Manager