

8 February 2011

Project Officer Application A1042
Food Standards Australia New Zealand
PO Box 10559
The Terrace
WELLINGTON 6036

FS350-117-1042

Dear Sir/Madam

Application A1042 – Food Derived from Herbicide-tolerant Corn Line DAS-40278-9 – Assessment Report

Thank you for the opportunity to comment on this application. The Ministry of Agriculture and Forestry (MAF) has the following comments to make.

On the basis of the information presented in the FSANZ Assessment Report, MAF agrees that no public health and safety concerns are identified. We do have however comments on two sections of the Safety Assessment Report, that FSANZ could consider when preparing the Approval Report. These are as follows:

- Section 5 (Herbicide Metabolites) of the Safety Assessment Report (Supporting Document 1). This section states that 2, 4 - dichlorophenol and quizalofop-P acid (called quizalofop phenol in Figure 7) are generated from herbicides applied to DAS-40278-9 corn, and that these products are also generated in conventional crops treated with the same herbicides (i.e. 2-4-D and quizalofop-P-ethyl). As the AAD-1 enzyme is unlikely to be present, then it is possible that other biochemical pathways (or environmental factors) cause cleavage of the herbicides. This is not explained in the Safety Assessment Report. In our view, additional evidence that these products occur in conventional crops through degradation of the herbicides should be presented.
- Section 6 (Compositional Analysis) of the Safety Assessment Report. Statistically significant treatment effects are identified for a number of the reported compositional analysis. We presume that treatment effects relate to differences between sprayed and unsprayed DAS-40278-9. This could be clarified in the report, and perhaps a comment made about the significance or otherwise, of these differences.

Yours sincerely

Jenny Reid
Manager Food Safety
Science, Information and Risk Directorate