

HEALTH PROTECTION DIRECTORATE

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Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

Dear Sir / Madam

Submission – Application A1041 – Food derived from SDA Soybean Line MON87769

Thank you for the opportunity to provide a submission on the 2nd Assessment Report for Application A1041.

Queensland Government overview of genetically modified (GM) food

The Queensland Government is supportive of the move towards legislation that deals with genetically modified (GM) organisms. The Government considers it important that advances in science and technology are not impeded if it is shown that these advances do not harm human health or the environment.

With respect to the commercial production of GM crops, the Queensland Government has not imposed a moratorium and has developed a policy framework for coexistence of GM and non-GM crops, with the use of GM crops considered on a case by case basis.

The use of GM food is also considered on a case by case basis, with particular consideration and relevance to human health.

Role of Queensland Health

This is a whole of Queensland Government response and is made by Queensland Health since it is the lead agency in Queensland which coordinates policy advice relative to the national policy on food regulation. Our approach follows consultation with other relevant Queensland Government agencies.

Issues relative to this Application

Although other relevant Queensland Government stakeholders have indicated they have no issues relative to this Application, Queensland Health has identified a number of issues and concerns and requests these be considered.

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Queensland notes our request for advice on the progress of the submissions referred to in the 1st Assessment Report (2.2 Overseas approvals) and the anticipated timelines for the determinations relative to these submissions has not been addressed in the 2nd Assessment Report. It is important to be advised of such information as it provides guidance as to overseas countries positions and considerations on this particular matter.

Queensland also notes our request for the advice provided by FSANZ to the Office of Best Practice Regulation relative to the assessment of this Application in order to understand how the result of the benefit-cost analysis was reached has not been addressed in the 2nd Assessment Report. This information will assist in understanding the conclusion reached that there are no significant cost implications for agencies which enforce food legislation.

It would be appreciated if advice could please be provided on these two matters so that Queensland can adequately assess and consider this Application.

It would also be appreciated if the detection methodology for this GM food could be provided to Queensland Health Forensic & Scientific Services to determine if it will be possible for the standard to be appropriately enforced.

Yours sincerely

Gary Bielby
Team Leader
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Environmental Health Branch