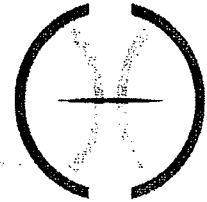


# Complementary Healthcare Council of Australia



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

28 March 2011

Dear Sir/Madam,

## CHC Submission –

**Application A1046-Food derived from Herbicide-tolerant Soybean  
Line DAS-68416-4:2nd Assessment.**

Thank you for providing the opportunity for the complementary healthcare industry to comment on the above consultation papers dated 14 February 2011.

The Complementary Healthcare Council (CHC) is the leading expert association exclusively committed to a vital and sustainable complementary healthcare products industry. We are unique in representing all stakeholder groups in the complementary healthcare industry; our members include importers, exporters, raw material suppliers, manufacturers, wholesalers, distributors, retailers, practitioners, consultants, direct marketers, multi-level marketers 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 on Application*

## *A1046*

- The CHC generally supports the applications for GMO soybean 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.
- In relation to application A1046, the CHC notes that in accordance with general labelling provisions, food derived from soybean line DAS-68416-4, if approved, would be required to be labelled as genetically modified if it contains novel DNA or novel protein, of which it does. The CHC questions why the labelling for this soybean line does not include the provision '*irrespective of whether the DNA or protein are present in the final food*'; the CHC suggests this statement be included for consistency.
- 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, an independent assessment would be required by the Office of Gene Technology Regulator in Australia before commercial release could be permitted. The CHC encourages a sustainable complementary food product industry and as such does not support any restrictions to international trade on soybeans.

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 cursive script, appearing to read 'K. Tomas'.

Kristy Tomas  
Scientific & Regulatory Affairs Manager