

Australian Food and Grocery Council SUBMISSION

27 FEBRUARY 2012

TO:
FOOD STANDARDS AUSTRALIA NEW ZEALAND

IN RESPONSE TO:
A1066 - HERBICIDE-TOLERANT CORN LINE MON87427



Australian Food and Grocery Council

1. PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

With an annual turnover of \$108 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity. The industry is similar in size to the mining sector.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector¹ is Australia's largest and most important manufacturing industry. Representing 26 per cent of total manufacturing turnover, the sector the second largest industry behind the Australian mining sector and accounts for over one quarter of the total manufacturing industry in Australia.

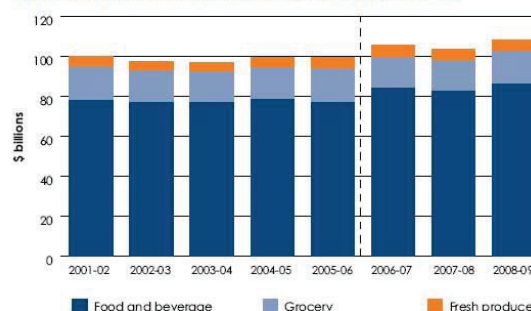
The growing and sustainable industry is made up of over 30,100 businesses and accounts for \$46 billion of the nation's international trade. The industry spends \$368 million a year on research and development.

The food and grocery manufacturing sector employs more than 312,000 Australians, representing about 3 per cent of all employed people in Australia, paying around \$13 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia². It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

Figure 4.1: Composition of the industry's turnover (\$2008-09)



Source: ABS, catalogue number 8221.0 and 8159.0

¹ Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc.

² About Australia: www.dfat.gov.au



1. INTRODUCTION

AFGC welcomes the opportunity to make this submission to the Food Standards Australia New Zealand in response to the assessment report for Application A1066 - Food derived from Herbicide-tolerant Corn Line MON87427.

AFGC notes the intent of this application is to amend Standard 1.5.2 – Food produced using Gene Technology, in the Australia New Zealand Food Standards Code, to permit the sale and use of food derived from genetically modified (GM) corn line MON87427, conferring herbicide-tolerance.

The AFGC supports this application on the basis that there is no identified risk to public health and safety and that FSANZ has established that food derived from corn line MON87427 is as safe for human consumption as food derived from conventional corn cultivars.

AFGC supports the current requirements for labelling GM foods when novel DNA or novel protein is present, and that having established that a GM food is safe and approved for use, it is up to companies and individuals to make their own independent commercial decision as to whether or not to use this product and label the product accordingly.

Recommendation:

Support Option 2:

That FSANZ propose amending Table to clause 2 in Standard 1.5.2 – Food produced using Gene Technology to include food derived from *Herbicide-tolerant Corn Line MON87427*.

2. SPECIFIC COMMENTS

2.1. The Application

AFGC notes that the assessment report has considered the genetic modification used in this plant, the potential toxicity and allergenicity of the novel protein, and the comparison of the genetically modified plant with that of a conventional plant.

FSANZ did not identify any public health and safety concerns, and concluded that food derived from Corn Line MON87427 is as safe and wholesome as the equivalent commercial counterpart, and there were no compositional differences of biological significance compared to conventional (non-GM) corn cultivars.

2.2. Consumer information

AFGC considers the current regulatory arrangements for foods derived from gene technology (“GM Foods”; Australian New Zealand Food Standards Code *Standard 1.5.2 Foods Produced using Gene Technology*) are appropriate to **ensure protection of public health and safety** and adequate information to consumers for informed choice.

The labelling of GM food is not a safety issue. It is solely related to the nature, extent and practicalities of providing information for informed consumer choice.

Current labelling regulations require food to be labelled when it contains genetically modified (GM) material or when the food is materially modified through the use of gene technology. The regulations also recognise, the need for flexibility through exemptions and thresholds, in a way which does not undermine the effectiveness of providing for informed consumer choice.

These provisions are necessary as the food supply chain cannot guarantee absolute segregation of ingredients all the time resulting in occasional trace (i.e. less than 1%) accidental presence of GM material. The provisions also recognise that if a company determines not to use GM ingredients and has production processes which deliver non-GM foods, the occasional accidental presence of GM material should not render the company non-compliant with food labelling regulations.

The AFGC Product Information Form (PIF) may be of assistance to companies in identifying GM ingredients, and components of ingredients, and to ensure compliance with labelling requirements.