

22 August 2013

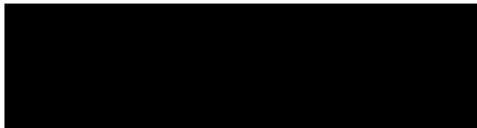
Manager
Application Assessments
Food Standards Australia New Zealand
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the Call for Submissions for **Application A1081 Food derived from Herbicide-tolerant Soybean Line SYHT0H2**.

Yours sincerely

A large black rectangular box redacting the signature of Katherine Rich.

Katherine Rich
Chief Executive

Food Standards Australia New Zealand
**APPLICATION A1081 FOOD DERIVED FROM HERBICIDE-
 TOLERANT SOYBEAN LINE SYHT0H2**

Call for Submissions

22 August 2013

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to make a submission on *Application A1081 Food derived from Herbicide-tolerant Soybean Line SYHT0H2*.

New Zealand Food & Grocery Council

The NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. Collectively this sector generates over \$28 billion in the New Zealand domestic retail food, beverage and grocery products market and over \$26 billion in export revenue from exports to 183 countries. Food and beverage manufacturing is the largest manufacturing sector in New Zealand representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages.

Food and beverage manufacturing and wholesaling in New Zealand directly employs over 100,000 people (5% total employment) and, when taking the wider food and beverage value chain (including farming and food retailing/foodservice) into account, employment soars to almost 350,000 in over 85,000 enterprises. This represents around one in five people employed in our country.

No matter how you look at it, the New Zealand food, beverage and grocery sector makes a substantial contribution to the New Zealand domestic economy, to our exports and to the general economic well-being of the country.

Application A1081

The NZFGC understands that the soybean line SYHT0H2 is tolerant to the herbicide glyphosate-ammonium and to herbicides, such as mesotrione, that inhibit *p*-hydroxyphenylpyruvate dioxygenase (HPPD). The tolerance is achieved, for the former, through the expression of the enzyme phosphinothricin acetyltransferase (PAT) encoded by a *pat* gene obtained from the soil bacterium *Streptomyces viridochromogenes*. Tolerance to mesotrione is achieved through expression of the AvHPPD-03 protein encoded by the *avhppd-03* gene from oat (*Avena sativa*). NZFGC also understands that the *pat* gene has been widely used to confer glyphosate tolerance in a range of GM crop species that have previously been found to be safe as foods and have been included in the Australia New Zealand Food Standards Code. FSANZ also notes that it has previously assessed an HPPD protein (in soybean under A1051).

Comments

The safety assessment of soybean line SYHT0H2 conducted by Food Standards Australia New Zealand (FSANZ) included consideration of the following key elements:

- molecular characterisation of the inserted novel genes and inter-generational stability
- characterisation of the novel proteins expressed by the soybean line (PAT and AvHPPD-03), their response to processing (no concentration of proteins) and the conformance of proteins to size, amino acid sequence and activity was as expected to ensure that neither novel proteins are likely to be toxic or allergenic in humans
- herbicide metabolites to ensure that spraying the genetically modified soybean line would not result in the production of novel herbicide metabolites that are not already present in conventional crops
- detailed compositional analyses to ensure nutritional adequacy of the soybean seed and that levels of several components (including fatty acids, vitamins, minerals and isoflavones) were comparable to non-GM soybean crops.

The FSANZ assessment of soybean line SYHT0H2 was restricted to food safety and nutritional issues. FSANZ did not identify any potential public health and safety concerns with SYHT0H2.

The NZFGC supports choice in the market place and for manufacturers. The NZFGC also notes that all safety assessment reports of GM products are independently peer reviewed. On this basis, NZFGC therefore supports the approval of soybean line SYHT0H2. This does not infer its use in New Zealand nor is this intended to influence the current process for environmental release of GM organisms in New Zealand which is an entirely separate process.