



19 November 2013

Project Officer Application A1085
Food Standards Australia New Zealand
PO Box 10559
The Terrace
WELLINGTON 6036

FS350-117-1085

Dear Sir/Madam


Application A1085 – Food derived from Reduced Lignin Lucerne Line KK179 – Call for Submissions

Thank you for the opportunity to comment on this application. The Ministry for Primary Industries (MPI) has the following comments to make.

We agree with the FSANZ conclusion that no potential public health and safety concerns have been identified, and therefore support option 1, which is to develop a variation to Standard 1.5.2, to cover the event of inadvertent entry of food from line KK179 into New Zealand.

We note that the Call for Submissions report discusses how inadvertent entry is dealt with under the regulations in both countries (and in the case of New Zealand, MPI tests lucerne seed at the border for the inadvertent presence of GM seeds in both seed for sowing and sprouting, and would respond to incidents where viable GM lucerne is inadvertently imported/grown). The Approval Report could also note that the intentional importation and/or growing of viable GM lucerne in New Zealand would require a HSNO Act approval.

Yours sincerely


Manager Food Science and Risk Assessment