



Australian Organic Ltd

Re: Application A1085 – Food Derived from Reduced Lignin Lucerne Line KK179

Australian Organic Ltd (formerly Biological Farmers of Australia), is Australia's foremost organic body, a not-for-profit organisation that represents and develops the interests of more than 3,000 organic industry farmers, operators, producers, processors and traders.

Australian Organic Ltd is aware of the submission to FSANZ prepared by Organic Dairy Farmers Australia (ODFA), and concurs with the points raised and conclusions contained within that submission.

In particular, Australian Organic Ltd is concerned that the safeguards available to protect organic and conventional farmers are wholly inadequate in the face of GMO contamination risks. Although Australian Organic Ltd is particularly concerned about the cultivation of GM crops in Australia, we are increasingly concerned about the evidence identified in ODFA's submission of volunteer and feral populations of GMOs in countries that have never cultivated GMOs. Australian Organic Ltd believes that if Lucerne Line KK179 is authorised for importation to Australia, there is a strong risk of volunteer and feral populations becoming established which could put Australia's organic and dairy industries at significant risk.

Australian Organic Ltd is also concerned about the potential impacts of Lucerne KK179 on public health and safety. We agree with ODFA's submission that FSANZ erred in failing to take into account the risks to human health posed by:

- a) chemical residue on Lucerne KK179 imported from the United States;
- b) stacking GM traits of Lucerne KK179 with Lucerne J101 and J163;
- c) livestock fed with Lucerne KK179 and the potential health risks to humans of consuming of animal products from those animals; and
- d) the environmental impacts of the introduction of Lucerne KK179 into the environment, including impacts on biodiversity.

Australian Organic Ltd strongly concurs with ODFA's submission that the importation of Lucerne KK179 puts the organic market at unacceptable risk, and will also disadvantage consumers.

Australian Organic Ltd submits that for these reasons, as further explained in ODFA's submission, the Application should be rejected.

Recommendation: Option 2 – Reject Application

Paul Stadhams

Chief Executive Officer

Australian Organic Limited