

22 March 2016

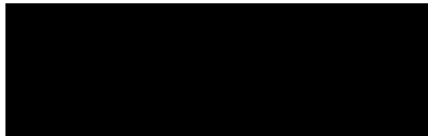
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for submissions – Application A1118: Food derived from Herbicide-tolerant Corn Line MON87419.***

Yours sincerely



Katherine Rich  
**Chief Executive**

**Food Standards Australia New Zealand**  
**CALL FOR SUBMISSIONS – APPLICATION A1112: FOOD DERIVED**  
**FROM HERBICIDE-TOLERANT CORN LINE MON87419**

**22 March 2016**

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to comment on the ***Call for submissions – Application A1112: Food derived from Herbicide-tolerant Corn Line MON87419.***

### **New Zealand Food & Grocery Council**

NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

### **The Application**

Monsanto is seeking permission for food derived from corn line MON87419, which is genetically modified to provide tolerance to the herbicides glufosinate ammonium and dicamba. Tolerance to dicamba is achieved through expression of a protein encoded by a gene from a common soil and aquatic environment bacterium while tolerance to glufosinate is achieved through expression of the enzyme commonly known as PAT. The safety of both proteins has previously been assessed by FSANZ (e.g. A1080—Food derived from Herbicide-tolerant Cotton Line MON88701 (9 Jan 2014) and A1081—Food derived from Herbicide-tolerant Soybean Event SYHT0H2 (27 February 2014)).

### **Comments**

The safety assessment of MON87419 conducted by FSANZ included the following key elements:

- a characterisation of the transferred genetic material, its origin, function and stability in the corn genome
- characterisation of novel nucleic acids and protein in the whole food
- detailed compositional analyses
- evaluation of intended and unintended changes
- the potential for any newly expressed protein to be either allergenic or toxic in humans.

The assessment of corn line MON87419 was restricted to human food safety and nutritional issues. Detailed compositional analyses were done to establish the nutritional adequacy of corn from MON87419 and to characterise any unintended compositional changes. FSANZ particularly noted that, of the 53 components statistically analysed, no biologically significant differences were found between MON87419 and the conventional control. FSANZ found that all analytes fell within the range of natural variation published in the literature. FSANZ therefore

concluded that grain from MON87419 was compositionally equivalent to grain from conventional corn varieties.

In terms of toxicity and allergenicity, FSANZ found that the two newly expressed proteins, DMO and PAT, were particularly low in grain. Bioinformatics studies on each of the proteins confirmed the lack of any significant amino acid sequence similarity to known protein toxins or allergens. This supports the conclusion that neither DMO nor PAT is toxic or allergenic in humans.

Previous safety assessments of both DMO and PAT reached the same conclusion. This corn line is currently being assessed in six other countries (USA, Canada, Japan, Korea, Taiwan and Argentina). FSANZ reports that Canada has completed its technical review but for both USA and Canada at least the applications are for cultivation which is not the basis of Application A1118. The result of the FSANZ assessment identified no potential public health and safety concerns.

NZFGC supports choice in the market place and for manufacturers and notes that all safety assessment reports of GM products prepared by FSANZ are independently reviewed. On this basis, NZFGC supports the approval of MON87419. This does not infer its use in New Zealand nor is this intended to influence any process for environmental release of GM organisms in New Zealand which is an entirely separate process.