

TO: FSANZ

Re:Application Number A1138

Proposal for Food derived from Pro-vitamin A Rice Line GR2E

I am writing as a retired scientist who has had a career as a researcher working on the improvement of the nutritive value of crops and pastures for food and feed. I have kept a watching brief on the science behind Golden Rice and support the draft variation to Schedule 26 that includes a reference to food derived from Pro-vitamin A rice line GR2E, which appeared for public comment on the FSANZ website on 3 August 2017.

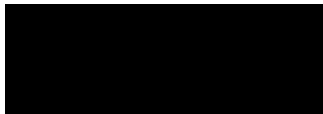
I work in countries of Africa and South Asia where I see that Vitamin A deficiency (VAD) is still a serious cause of mortality and morbidity, including blindness, in young children. This is despite current interventions and improving living standards. VAD is a nutritionally acquired immune deficiency syndrome, and is the most significant cause of mortality in children under 5 years of age as well as the most important cause of childhood blindness. VAD afflicts about 19 million pregnant women and 190 million pre-school age children, mostly in Southeast Asia and Africa.

Pro-vitamin A GR2E Rice, also known as Golden Rice, has been shown to provide an additional intervention to combat vitamin A deficiency, with minimal cultural change. Every grain of Golden Rice is labelled with its colour, instantly 'readable' by any level of literacy in any language. The technology has been donated by its inventors for use in developing countries and in publicly owned rice varieties. There are no limitations, except export sale, on the use of Golden Rice, which can be locally sold, or re-sown by growers. The terms of the licenses in place in The Philippines, and elsewhere, ensure that Golden Rice will cost no more than the white rice variety into which the nutritional trait has been added. Growers or consumers have no obligation to sign anything, or pay anything for the extra nutrition. The agronomy of the varieties is unaffected by the introduction of the nutritional trait.

While Golden Rice is not intended to be grown or commercialized in Australia or New Zealand, its developers are applying for permission to include it in the Code to prevent any trade issues in the event that small amounts of GR2E rice inadvertently enter the food supply. This could happen via exports from countries that may supply significant quantities of milled rice to Australia/New Zealand.

I am satisfied that FSANZ has completed a thorough safety assessment that included a characterization of the transferred gene sequences, their origin, function and stability in the rice genome; the changes at the level of DNA and protein in the whole food; compositional analyses; an evaluation of intended and unintended changes; and a nutrition risk assessment in relation to β -carotene intake. I fully accept the conclusion that food derived from GR2E is considered to be as safe for human consumption as food derived from conventional rice and that this conclusion is fully supported by the data provided and other available information, and for this reason, the variation to Schedule 26 in the Code to include food derived from Pro-vitamin A GR2E rice should be allowed.

Yours sincerely,

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TJ Higgins AO FAA FTSE