

Application Number A1138

Proposal for Food derived from Provitamin A Rice Line GR2E

I write in support of the draft variation to Schedule 26 that includes a reference to food derived from provitamin A rice line GR2E, which appeared for public comment on the FSANZ website on 3 August 2017.

In many countries, Vitamin A deficiency (VAD) remains a serious cause of mortality and morbidity, including blindness, for young children, despite current interventions and improving living standards. The deficiency is a nutritionally acquired immune deficiency syndrome, and the most significant cause of under 5 years child mortality 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.

Provitamin A GR2E Rice, also known as Golden Rice, has the proven capacity 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 public owned rice varieties, and there are no limitations, except export sale, on the use of Golden Rice harvest, which can be locally sold, or replanted 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 the nutritional trait has been introduced to. 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 being responsible stewards of the technology and 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 via exports from countries that may supply significant quantities of milled rice to Australia/New Zealand.

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. The conclusion that food derived from GR2E is considered to be as safe for human consumption as food derived from conventional rice 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 provitamin A GR2E rice should be allowed.

Yours sincerely,

Sunny Sun

Government Affairs, China

Dow AgroSciences