

[REDACTED]

From: Michael Trott [REDACTED]
Sent: Monday, 3 July 2017 10:47 AM
To: submissions
Subject: Submission requesting FSANZ DECLINE application A1139

Submission requesting FSANZ **DECLINE** application A1139

ATT: FSANZ
Michael Trott
PO Box 101-49
Dominion Rd, Mt Eden
Auckland 1446
email: [REDACTED]

For the reasons detailed here FSANZ are requested to decline the application.

Approval represents a disregard for the health of consumers by denying people their right to know what they are eating. There is no requirement for GE foods sold by fast food and other restaurants to be labelled as such, so as to inform consumers. This would leave the public in the dark and result in unwilling and unwitting consumption of GE potatoes.

The lack of labeling requirements at likely sales channels for these GMO products is a serious breach of consumer rights that have been agreed and at least partly recognised and legislated for by parliament in Australia and New Zealand. FSANZ should not make an approval because the lack of mandatory labelling for food sold by restaurants is likely to lead to deception and unconsensual consumption of GE potatoes by consumers.

The lack of enforcement and monitoring of compliance in GM food labelling by FSANZ is remiss and approval of the application would add to this, and be against the public interest.

Given the current state of inadequate data and poor monitoring of labelling to protect fundamental consumer rights, it is not possible for FSANZ to meet the requirements of its own mission and to act ethically and professionally, and at the same time approve application A1139.

It is noted that the GE potato lines' compositions are significantly different to their parent line. This shows that the GE process has disrupted the cellular metabolism. As there are no feeding studies to evaluate these effects, it is not possible to conclude that there are no biologically relevant differences.

Independent science to 2017 shows FSANZ has fallen behind best practice science.

FSANZ must require sequencing using molecular profiling analyses or "omics".

The best evidence available for effective safety assessment also requires long-term toxicity studies in established animal model systems. In the absence of these data to inform FSANZ, there can be no legal approval of A1139

There is no consumer benefit or nutritional benefit from the GE potatoes listed in this application to outweigh known and unknown risks, compared to existing potato varieties that industry can use.

The GE potato lines offer no nutritional advantage, as there are non-GE potato varieties that are naturally low in the desired profiles.

This demonstrates that there is no need for approval of the GE potatoes. Rather than approving this application, FSANZ could instead recommend non-GE potato varieties that have naturally-occurring low levels of compounds responsible for acrylamide production. They could also educate food businesses on storing and cooking procedures that minimize acrylamide production.

There is also a wider economic threat from GE potatoes accidentally entering the local food environment.

Whole or even very small parts of any uncooked (raw) tubers endanger New Zealand's biosecurity. GE potatoes could either potentially be planted without regulation or establish themselves as wild populations.

FSANZ is respectfully urged to recognise these major failings and decline the application.