

[REDACTED]

From: [REDACTED]
Sent: Sunday, 2 July 2017 9:04 AM
To: submissions
Subject: Submission opposing approval of A1139 Food derived from Potato Lines E56, F10, J3, W8, X17 & Y9.
Categories: [REDACTED]

Submission requesting FSANZ **DECLINE** application A1139

Dear FSANZ

I write with concern that this application is at risk of being rubber-stamped by FSANZ, further undermining confidence in the organisation's conduct and process.

In the current state of inadequate data and poor monitoring of labelling to protect fundamental consumer rights, it is not possible for FSANZ to both act ethically and approve application A1139 Food derived from Potato Lines E56, F10, J3, W8, X17 & Y9.

The lack of labeling requirements at likely sales channels for these GMO products (e.g fast food restaurants), 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.

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.

FSANZ must require whole genome sequencing to identify off-target mutations and also essential to ascertain the effects of unintended changes on global patterns of gene function.

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

- transcriptomics — gene expression profiling,
- proteomics — protein composition profiling,
- metabolomics — profiling of metabolites,

- miR-omics – microRNA profiling

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

These GE potato lines offer no nutritional advantage, as there are already 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..

The FSANZ assessment is compromised with respect to rigorous scientific procedure. These GE potato lines cannot be approved for the human or animal consumption without compositional analysis of differences to their non-GE counterparts.

FSANZ must provide evidence of safety, when eaten, in the lines that have significant variations in nutrients, or more importantly anti-nutrients. Anti nutrients such as glycoalkaloids can be highly toxic for consumers.

Without such studies, and mandatory labeling it is wrong for FSANZ to consider any approval of the A1139 application.

Yours Sincerely

Jon Carapiet