

[REDACTED]

From: [REDACTED]
Sent: Thursday, 6 July 2017 8:56 PM
To: submissions
Subject: Re: Submission To FSANZ Application A 1139

Submission To FSANZ Application A 1139

submissions@foodstandards.gov.au

Lisa Elizabeth Anne Er

[REDACTED]

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Please note, that as a member of Auckland GE Free Coalition I also endorse their submission.

I ask that FSANZ decline the approval of application A1139 - Food derived from Potato Lines E56, F10, J3, W8, X17 & Y9.

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.

I strongly object to FSANZ approving application A1139 - Food derived from Potato Lines E56, F10, J3, W8, X17 & Y9. I ask that FSANZ decline the application

There is no comprehensive data showing evidence of unintended effects of the transgenic potato lines. It makes it mandatory for FSANZ to decline the approval.

It is necessary for FSANZ to 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

The APHIS documentation shows that these 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.

Instead of 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 the provision of comprehensive information regarding compositional differences to their non-GE counterparts. Compositional analyses are very limited in that they can only assay for known compounds. Any novel compounds would not be detected in such analyses.

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.

The afore-mentioned studies have not been carried out and in their absence, there should be no legal approval of the A1139 application.

In past studies, ([2002](#)) GM potatoes affected some of the male secondary sex organs in rats, similar studies also ought to be routinely performed with female small animals and extended to studies into the effects of GM foodstuffs on reproductive performance. Furthermore, as some of the potential effects of the consumption of GM foods is likely to be manifested in the long-term, these reproductive studies should be coupled to nutritional/ toxicological tests in which offspring of successive generations brought up on GM food should be tested in comparison with those reared on comparable non-GM diets. I cannot find evidence that this has been done.

*The possible lack of labelling requirements at sales channels, and the lack of labelling at restaurants for these GMO products, would result in a serious breach of choice for consumers.
Please do not approve these GE potatoes.*

*Yours Sincerely
Lisa Er*

*Lisa Er
Founder and Leader of The Awareness Party
<http://www.theawarenessparty.com/>*

*"You never change things by fighting the existing reality.
To change something, build a new model that makes the existing model obsolete."
Buckminster Fuller.*

*View our video
<https://www.youtube.com/watch?v=4vOY1fAnEt4>*



