SUBMISSION FROM SA HEALTH
26 October 2017

Application A1143
Food derived from DHA Canola Line NS-B50027-4

SA Health welcomes the opportunity to provide comment on this application.

SA Health generally supports the application as the FSANZ safety assessment has concluded that there are no potential public health and safety concerns identified. However, the following issues are raised:

Biofortification policy

This application is to consider approval of a genetically modified food that alters the nutritional profile of the food. As such it is an important precedent that approval be considered in relation to a biofortification policy. The biofortification policy is still under development and there is no current definition of biofortification in the Food Standards Code. Codex Alimentarius is currently in the process of drafting a definition for biofortification.

FSANZ should consider a "stop clock" on the application until a biofortification policy is developed.

Need for additional labelling requirements

Labelling of GM food is intended to address the objective set out in paragraph 18(1)(b) of the FSANZ Act—the provision of adequate information relating to food to enable consumers to make informed choices. For this reason, FSANZ should consider whether additional labelling (i.e. in addition to the mandatory 'genetically modified' statement) is required to alert consumers to the nature of the altered characteristic when compared to non-GM canola.

SA Health considers that additional mandatory labelling should be required to inform the consumer of the change to the omega-3 long chain fatty acids content by genetic modification.

SA Health considers that since the food has been changed by genetic modification to alter a characteristic that is relevant to the consumer's choice of the product that the information should be provided to the consumer on the label. Consumers should be informed of the nutritional change.

Most foods approved by FSANZ that are genetically modified have been changed to alter a characteristic for the crop growth of the food such as herbicide resistance. The A1143 application is for a genetically modified food that intentionally alters

nutritional content. Not providing this information would be misleading to the consumer. It is considered that the canola oil may not be substantially equivalent nutritionally to the non-genetically canola oil, and should be accurately and fully labelled to inform consumers.

Infant formula products

It is important that the assessment of A1143 have regard to the Policy Guideline on Regulation of Infant Formula products and that the exclusion of the canola oil from infant formula products is based on a lack of specific data in Application A1143 regarding the use in infant formula products, rather than from any identified safety concern.

The proposed drafting uses Schedule 26 - Food produced using gene technology to state that the canola line may not be used in infant formula. It is questioned whether using Schedule 26 to exclude permission for the canola oil in infant formula products is more appropriate than using Standard 2.9.1 - Infant formula products. Standard 2.9.1 would be more readily consulted to look for permission for ingredients in infant formula products by manufacturers.