

21 December 2017

Project Manager
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6143
NEW ZEALAND

Email: submissions@foodstandards.gov.au

Dear Sir Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for submissions – Application A1147 Food derived from Herbicide-tolerant Cotton Line GHB811.***

Yours sincerely

Katherine Rich



***Call for submissions – Application A1147
Food derived from Herbicide-tolerant
Cotton Line GHB811***

**Submission by the New Zealand Food & Grocery
Council**

21 December 2017

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the *Call for submissions – Application A1147 Food derived from Herbicide-tolerant Cotton Line GHB811*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

THE APPLICATION

3. Bayer CropScience has sought permission for food derived from dual herbicide tolerant cotton line GHB811. Cotton line GHB811 is genetically modified to provide tolerance to the broad spectrum herbicide glyphosate and isoxaflutole. Tolerance to these herbicides is achieved with the expression of a modified corn-derived genes producing protein enzymes.
4. The safety of both protein enzymes (2mEPSPS and HPPD) has previously been assessed by FSANZ.
5. Bayer CropScience indicated that food derived from GBH811 may be used in food as cottonseed oil (in foods such as frying oil, salad and cooking oil, and as an ingredient in mayonnaise, salad dressing, shortening, and margarine) and linters (a by-product of oil extraction from cotton seeds and processed into forms of cellulose that may be used in certain food additives, for example anticaking agents and thickeners).

COMMENTS

6. The safety assessment of GHB811 included several key elements. Detailed compositional analyses were conducted to establish the nutritional adequacy of seed from GHB811 and to characterise any unintended compositional changes. FSANZ concluded that that seed from GHB811, whether from unsprayed GHB811 plants or plants sprayed, was compositionally equivalent to seed from conventional canola varieties.
7. In undertaking a characterisation of the transferred genetic material, FSANZ noted that there were no concerns regarding the potential toxicity or allergenicity of the expressed proteins. Previous safety assessments of 2mEPSPS had indicated this protein would be rapidly degraded in the digestive system following ingestion and would be inactivated by heating. The same was true of the HPPD. Additionally, updated bioinformatic studies considered in the assessment by FSANZ confirm the lack of any significant amino acid sequence similarity to known protein toxins or allergens.
8. Taken together, the evidence indicated that should the proteins be present in the diet they were unlikely to be toxic or allergenic in humans. The result was no potential public health and safety concerns being identified and food derived from GHB811 was therefore considered to be as safe for human consumption as food derived from conventional cotton varieties.

-
9. In terms of nutritional impact, and ensuring that the food is nutritionally adequate and will support typical growth and wellbeing, FSANZ assessed this through a detailed understanding of the genetic modification and its consequences, together with extensive compositional analyses of the food presented by the applicant. FSANZ found that the genetic modification had not altered the nutritional adequacy of cotton line GHB811 as a source of food when compared with that of conventional cotton varieties. The introduction of foods derived from cotton line GHB811 into the food supply was therefore expected to have negligible nutritional impact.
 10. We note that an application for approval of Cotton Line GHB811 was made to the USFDA in August 2017. Bayer CropScience has also made submission for food and feed approval in other countries (Canada (Health Canada) and Korea (Ministry of Food and Drug Safety)) during the FSANZ application process.
 11. NZFGC supports choice in the market place and for manufacturers and note that all safety assessment reports of GM products prepared by FSANZ are independently reviewed. On this basis, NZFGC supports the approval of GHB811. This does not infer its use in New Zealand nor is this intended to influence any process for environmental release of GM organisms in New Zealand which is an entirely separate process.