



Enquiries to: Food Safety Standards and
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File Ref: QCOS/32135

20 December 2017

Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
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Dear Sir / Madam

**Submission – Application A1147 – Food derived from Herbicide-tolerant Cotton Line
GHB811**

Thank you for the opportunity to provide a submission on the Call for Submissions paper for Application A1147.

This submission provides comment on the proposed changes to the Australia New Zealand Food Standards Code. It was prepared with the advice of officers from the Queensland Department of Agriculture and Forestry (DAF) and Safe Food Production Queensland (SFPQ). The submission does not represent a Queensland Government position, which will be a matter for the Queensland Government should notification be made by the FSANZ Board to the Australia and New Zealand Ministerial Forum on Food Regulation.

Application A1147 seeks a variation to Schedule 26 in the *Australia New Zealand Food Standards Code* (the Code) to include food from a new cotton line, GHB811, which has been genetically modified to be resistant to the two herbicides, glyphosate and isoxaflutole.

Schedule 20 – Maximum Residue Limits in the Code does not permit residues of the agvet chemical isoxaflutole to be found in cottonseed. This means that the restriction on imported food containing cotton line GHB811 would remain in place, should it contain isoxaflutole. FSANZ is requested to include in the Approval Report a discussion on the restriction on importing food containing cotton line GHB811 due to the absence of a maximum residue limit for isoxaflutole in cotton seed and cotton seed oil.

The cost benefit analysis in the Call for Submissions Paper will need to be revised because the analysis is based on the assumption that there will be no restriction importing food containing this cotton line. It concluded that not preparing a draft variation offers little benefit to consumers because approval by other countries could limit availability of imported cotton products. However, this will not be the case if there is not also a maximum residue limit in the Code for isoxaflutole.

Should you require further information in relation to this matter, please contact Food Safety Standards and Regulation, Health Protection Branch, Department of Health on (07) 3328 9310 or at foodsafety@health.qld.gov.au.

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