Project Officer Application A1196
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6036

9 June 2020

Dear Sir/Madam

A1196 – Food derived from nematode-protected and herbicide-tolerant soybean line GMB151 :

Thank you for the opportunity to comment on this application. New Zealand Food Safety (NZFS) has the following comments to make.

We note that the application seeks approval for food derived from soybean line GMB 151, that has been genetically modified to be protected from parasitic nematodes and tolerant to HPPD-inhibitor herbicides such as isoxaflutole.

We support that the safety assessment addresses food safety issues associated with the GM food. No potential public health and safety concerns have been identified. Based on the data provided and other information, food derived from GMB151 is considered to be as safe for human consumption as food derived from conventional soybean cultivars. The assessment concluded that the genetic modifications to GMB151 are expected to have negligible nutritional impact. We have the following specific comments made in consultation with ESR, where some clarification could be made:

- The deletion of the left border and 481 base pairs (bp) of the *P2x35S* enhanced promoter sequence (from cauliflower mosaic virus), which drives expression of the *hppdPf-4Pa* gene, was noted. Subsequent material in the assessment made it clear that the HPPD-4 protein was expressed, indicating that the promoter remained functional. It appears that the deletion was of no significance, but this is not stated in the assessment.
- The open reading frame (ORF) analysis of the insertion identified a large number of ORFs coding for putative peptides of 3 amino acids or more. The application restricted further analysis of the putative peptides to those of 30 amino acids or more. Other GM food applications have chosen a much lower cut-off point (e.g. A1192, 8 amino acids). FSANZ is encouraged to seek standardisation of this component of the applications, with a clear rationale for the cut-off used.
- The assessments of acute toxicity carried out only considered a single species, at a single dose. Given the uncertainty around the mechanism of action of the Cry14Ab1 protein, a more detailed analysis of its potential acute mammalian toxicity would have provided greater assurance of the safety of this protein for human consumption. However, it is noted that in silico analyses did not identify any significant similarity with known allergens or toxins.

New Zealand Food Safety – Haumaru Kai Aotearoa
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Therefore, NZFS supports the draft variation to Schedule 26 of the Food Standards Code, to permit food derived from GMB151 in accordance with Standard 1.5.2.

Yours sincerely

pp John van den Beuken

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Manager Food Science