



7 June 2023

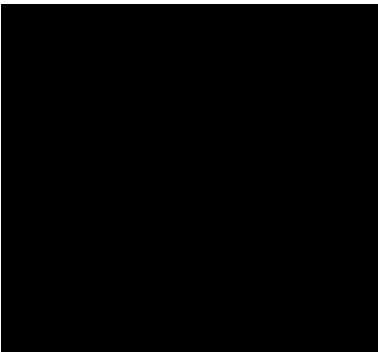
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the *Call for submissions – Application A1264 - Food derived from drought-tolerant and herbicide-tolerant soybean line IND-00410-5*.

Yours sincerely





**Call for submissions: Application A1264
Food derived from drought-tolerant and
herbicide-tolerant soybean
line IND-00410-5**

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

7 June 2023

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (**NZFGC**) welcomes the opportunity to comment on the *Call for submissions – Application A1264 - Food derived from drought-tolerant and herbicide-tolerant soybean line IND-00410-5*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

THE APPLICATION

3. Bioceres Crop Solutions, Argentina, is seeking to amend the Australia New Zealand Food Standards Code (**Food Standards Code**) to permit the sale and use of food derived from a new soybean produced using gene technology: soybean line IND-00410-5. This soybean line has been genetically modified for tolerance to drought and the herbicide glufosinate.
4. Soybean is most commonly used as an oil in foods and can be used in shortening, margarine, frozen desserts and confectionery products and the product is also used to make soy milk, soy sauce, soy lecithin and meat substitutes such as tofu and tempeh. However, Bioceres, in its application, indicates it is not expecting to export the product at this time.

COMMENTS

Assessment by FSANZ

5. FSANZ addressed health and safety concerns in its risk assessment covering:
 - a characterisation of the transferred genetic material, its origin, function and stability in the soybean genome
 - characterisation of novel nucleic acids and protein in the whole food
 - detailed compositional analyses
 - evaluation of intended and unintended changes
 - assessment of the potential for any newly expressed protein to be either allergenic or toxic in humans.
6. Based on the data provided in the present application and other available information, food derived from soybean line IND-00410-5 is considered to be as safe for human consumption as food derived from non-GM soybean varieties.
7. In terms of composition, FSANZ has concluded that overall, the compositional data are consistent with the conclusion that there are no biologically significant differences in the levels of key constituents in IND-00410-5 when compared with conventional non-GM soybean varieties already available in agricultural markets. Grain from IND-00410-5 can therefore be regarded as equivalent in composition to grain from conventional non-GM soybean.
8. FSANZ notes that IND-00410-5 is the result of genetic modifications to confer tolerance to drought and the herbicide glufosinate, with no intention to significantly alter nutritional parameters in the food. The compositional analyses demonstrated that the genetic modifications had not altered the nutrient composition of IND-00410-5 compared with that

of conventional non-GM soybean varieties. The introduction of food derived from IND-00410-5 into the food supply is therefore expected to have negligible nutritional impact.

9. In terms of labelling, refined products from soybean line IND-00410-5 such as soybean oil are unlikely to contain any novel DNA or novel protein and would be unlikely to require labelling as 'genetically modified'. However, products derived from soybean line IND-00410-5 such as soy milk, flour, meal and protein isolates would likely contain novel DNA or novel protein, and if so, would require labelling as 'genetically modified'.
10. Bioceres has submitted the application to a wide range of countries including Uruguay, Bolivia, India, the EU, Malaysia and Indonesia and it has been approved by China and South Africa. The application has also been accepted in the deregulated markets of the USA, Canada, Paraguay, Brazil and Argentina.
11. In light of the risk assessment and noting that this product could provide industry with choice in the future, NZFGC supports amendment to the Food Standards Code as proposed by FSANZ to permit soybean line IND-00410-5 to be used in the Australian and New Zealand food supply.