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Sent: Monday, 9 April 2018 5:29 PM
To: submissions <submissions@foodstandards.gov.au>
Subject: "FSANZ Submissions"

To Whom it may concern

It is my belief that all new genetic modification techniques should be assessed for safety before being allowed in our food. They should also be labelled for consumer choice. This includes gene editing, GM rootstock grafting, cisgenesis, intragenesis RNA interference and null segregants. Consumers have a right to know that the products they consume or purchase are not GM.

DNA methylation is quite clearly a genetic modification technique and can result in heritable genetic changes. It therefore needs to be assessed for safety before being used in our food. No one can know of all the consequences to GM and New Zealand should remain GM free.

All genetic modification techniques should be assessed for safety and these new GM techniques are quite clearly genetic modification techniques under -The Hazardous substances and New Organisms Act (HSNO) 1996 includes all new GM techniques including RNA interference.

Standard 1.5.2 defines "food produced using gene technology" as "a food which has been derived or developed from an organism which has been modified by gene technology." It states that "gene technology means recombinant DNA techniques that alter the heritable genetic material of living cells or organisms." This definition clearly includes gene editing techniques. The intent of the Gene Technology Act and Standard 1.5.2 was to capture all new GM techniques. Since RNA interference can also "alter the heritable genetic material of living cells or organisms" through DNA methylation the definition of gene technology in Standard 1.5.2 would be better changed to "gene technology means *in vitro* techniques that alter the heritable genetic material of living cells or organisms" for clarity.

I do not want GM food or plants in this country and would always want to be able to choose NOT to purchase GM products through clear labelling.

Regards

Fiona