

Meier, David

From: Cammans, Joanne (Health) [Joanne.Cammans@health.sa.gov.au]
Sent: Monday, 28 March 2011 4:37 PM
To: submissions
Cc: McWhinnie, Julie-Anne (Health)
Subject: SUBMISSION A1049 food derived from herbicide tolerant, high oleic acid soybean
Attachments: A1049 GM soy high oleic acid SA Submission Assessment Report.doc

Please note the attached submission by SA Health.

Regards Jo

Joanne Cammans
Scientific Officer

Food Policy & Programs Branch
Public Health
SA Health
Government of South Australia

Tel: 08 822 67858 (*Mon, Tues, Thurs*)
Fax: 08 822 67102
Email: joanne.cammans@health.sa.gov.au

Website: www.health.sa.gov.au

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**SUBMISSION FOR APPLICATION A1049 – FOOD DERIVED FROM
HERBICIDE TOLERANT HIGH OLEIC ACID SOYBEAN LINE MON87705**

**Food Policy and Programs Branch, SA Health
28 March 2011**

Thank you for the opportunity to provide comments to the Assessment Report for A1049. SA Health supports proceeding with an amendment to Standard 1.5.2 to include food derived from high oleic soybean line MON87705 and wishes to offer the following comments for consideration:-

- There are other non-GM oils (produced via non GM plant breeding methods) with very similar high oleic content that could be used in the food supply chain (e.g. high oleic canola oil, high oleic sunflower oil). See Table 1 for comparison of fatty acid profiles

Table 1: Comparison of fatty acid profiles of conventional and high oleic soybean oils with high oleic canola and sunflower oils (nutrients per 100g)

	Mono-unsaturated fat %	Omega-6 Poly-unsaturated fat %	Omega-3 Poly-unsaturated fat %	Saturated fat %
Conventional soybean oil¹	23	54	8	15
High Oleic soy bean oil²	76	10	7	~7
High oleic sunflower oil¹	80	10	0	10
High oleic canola oil³	67	25*	*	8

*NB Polyunsaturated fat content in reference 3 gives total polyunsaturated fat content, and does not differentiate between omega 6 and omega 3 content

Reference:

1. Goodman Fielder. Comparison of Oils and Spreads (nutrients per 100g). <http://www.spreadthefacts.com.au/oil-and-fat-facts/oil-facts.html> . Accessed 28 March 2011.
2. FSANZ Supporting Document 1. Application A 1049- Food derived from herbicide-tolerant, high oleic acid soybean line MON87705. Safety Assessment Report.
3. Heart Foundation. The 3 Step Guide. A guide for the Australian Foodservice Industry on reducing trans and saturated fats. National Heart Foundation of Australia. September 2010

- SA Health support the need for additional labelling requirements to alert consumers to the change in fatty acid profile, such as an additional mandatory labelling statement to the effect that the food has been genetically modified to contain high levels of oleic acid. Suggested

wording is; 'this food has been genetically modified to contain high levels of oleic (monounsaturated) fat in comparison to conventional soybean oil'.

- However it is noted that additional labelling was not required for the recently approved GM soybean (A1018) so consideration should be given to equability in this instance. Further guidance in the Code regarding labelling of GM foods with altered characteristics to provide transparent information to the consumer on the nature of the genetically altered characteristic may be needed as the number of these sorts of applications may rise with the increasing interest in the nutritional quality of foods.

Contact:

Joanne Cammans

Food Policy and Programs Branch

Contact: (08) 82267858

Cleared by:

Elena Anear

Principle Advisor

Regulatory Policy & Legislation

Food Policy and Programs Branch

SA Health