

27 September 2012

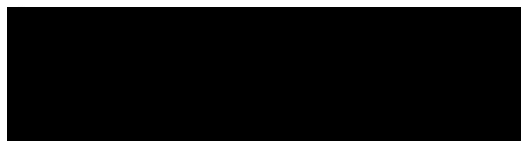
Manager
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the Assessment Report for **Application A1071** *Food derived from Herbicide-tolerant Canola Line MON 88302*.

Yours sincerely



Katherine Rich
Chief Executive

Food Standards Australia New Zealand
**APPLICATION A1071 FOOD DERIVED FROM HERBICIDE-
 TOLERANT CANOLA LINE MON 88302 APPLICATION**

Safety Assessment Report

27 September 2012

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to make a submission on *Application A1071 Food derived from Herbicide-tolerant Canola Line MON 88302*.

New Zealand Food & Grocery Council

The NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. Collectively this sector generates \$28.7 billion in the New Zealand domestic retail food, beverage and grocery products market and \$26.3 billion in export revenue from exports to 183 countries. Food and beverage manufacturing is the largest manufacturing sector in New Zealand representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages.

Food and beverage manufacturing and wholesaling in New Zealand directly employs 104,160 people (5% total employment) and, when taking the wider food and beverage value chain (including farming and food retailing/foodservice) into account, employment soars to 344,820 in 85,252 enterprises. This represents around one in five people employed in our country.

No matter how you look at it, the New Zealand food, beverage and grocery sector makes a substantial contribution to the New Zealand domestic economy, to our exports and to the general economic well-being of the country.

Application A1071

The NZFGC understands that the Canola line MON88302 is tolerant to the herbicide glyphosate and that tolerance is achieved through the introduction of the *cp4 epsps* gene, from the soil bacterium *Agrobacterium* sp]. Expressing the protein 5-enolpyruvylshikimate-3-phosphate synthase (CP4 EPSPS). NZFGC also understands that the EPSPS proteins have been widely used to confer glyphosate tolerance in a range of GM crop species that have previously been found to be safe as foods and have been included in the Australia New Zealand Food Standards Code.

Comments

The Australia New Zealand Food Standards Code contains, in Standard 1.5.2, the references to three previously approved herbicide-tolerant canola lines. The unique feature of the genetic modification in MON88302 compared to other approved herbicide-tolerant corn lines is that, according to the application, the regulatory elements driving expression of the *cp4 epsps* gene permit no, or only very low, expression of the CP4 EPSPS protein in pollen tissue. This means that inbred lines containing the MON88302 transformation event can be

sprayed with glyphosate at a critical developmental stage to produce male sterile female parents for use in hybrid seed production programmes.

The safety assessment of canola line MON88302 conducted by Food Standards Australia New Zealand (FSANZ) included consideration of the following key elements:

- an analysis of the molecular characterisation of the genetic material introduced into the host canola genome including the method used in the genetic modification and the function and regulation of the introduced genes
- the characterisation of the novel proteins including the function, phenotypic effects and the potential toxicity and allergenicity of the CP4 EPSPS protein
- detailed compositional analyses
- evaluation of intended and unintended changes.

The FSANZ assessment of canola line MON88302 was restricted to food safety and nutritional issues. FSANZ did not identify any potential public health and safety concerns with MON87427.

The NZFGC notes that the US Food and Drug Administration issued a consultation letter in April 2012 regarding the food and feed safety of MON88302, Health Canada completed an approval for food use of MON88302 in June 2012 and the Canadian Food Inspection Agency completed an approval for environmental release and use in animal feed in June 2012.

The NZFGC supports choice in the market place and for manufacturers. The NZFGC also notes that all safety assessment reports of GM products are independently peer reviewed. On this basis, NZFGC therefore supports the approval of MON88302. This does not infer its use in New Zealand nor is this intended to influence the current process for environmental release of GM organisms in New Zealand which is an entirely separate process.