

Comments from the Victorian Departments of Environment and Primary Industries and Health

Due date of submission – 29 April 2014

The Victorian Departments of Environment and Primary Industries and Health (the Departments) welcome the opportunity to provide comments on Application A1094.

Application A1094 seeks permission for the sale and use of food derived from cotton line DAS-81910-7 which has been genetically modified (GM) to confer tolerance to the herbicides 2,4-dichlorophenoxyacetic acid (2,4-D) and glufosinate ammonium.

From the FSANZ assessment report it is understood that:

- Cotton line DAS-81910-7 is a new crop designed to provide growers with an alternative to existing weed management strategies;
- The Applicant intends to commercially cultivate the crop predominantly in North America. There is currently no intention to apply for permission to cultivate the crop in Australia or New Zealand.
- The major foods derived from cotton are highly refined oil and linters (essentially pure cellulose), which, as they would be unlikely to contain any novel protein or DNA, would not require GM labelling; and
- The approval of Application A1094 would permit food derived from this GM cotton to enter the Australian and New Zealand markets.

The Departments acknowledge that no toxicity, allergenicity or nutrient composition concerns were raised by FSANZ in its safety assessment of this Application.

On this basis, the Departments support the progression of Application A1094.