

14 September, 2017

**Submission regarding Application A1138: Food derived from Provitamin A Rice Line GR2E**

It has come to my attention that FSANZ is considering approving the importation of Golden Rice - Provitamin A Rice Line GR2E (Application **A1138**) from the Philippines under an application submitted by the International Rice Research Institute.

I strongly urge FSANZ not to approve this application. I would note that the application itself is premature as Golden Rice is a highly controversial crop that has not even been approved within the Philippines at this stage.

Rice is a staple food in the Philippines, a country that has rich rice cultures and yet that also suffers from food security issues and poverty particularly in rural areas. The cultural, economic and social importance of rice means that the application for Golden Rice has been very sensitive in that country, and through Asia in general – as it has the potential to have strong negative effects on farming communities (for a fuller discussion, see Stone and Glover 2017). At the very least, FSANZ should wait until the Filipino domestic process is completed before approving Golden Rice into Australia.

Indeed, to allow importation into Australia, before approval in the Philippines is deeply anti-democratic and may be used as a reason to fast-track approval in the Philippines putting pressure on a politicized process in that country with deep domestic and cultural interest in the outcome. To put it bluntly, it would put FSANZ in the position of being a tool, that could be used to pressure the Philippine government to allow this approval without going through the appropriate process. It is thus in the strongest terms that I request FSANZ not to approve the importation of Golden Rice.

As an academic with expertise in rice cultures in the Philippines as well as food security issues in general, I must share my concerns about its use and approval, and its potential negative impact on Philippine farming communities. There is considerable concern about its efficacy and yield, its potential to supplant native and local varieties and so draw farmers into a cycle of needing to purchase additional pesticides and fertilizers to get yields, the fact that Golden Rice might act as a vehicle to smooth the entry of commercially generated GMO varieties (the 'Trojan Horse' of GMOs), and health and safety concerns generally. As a food security strategy, it is much more healthy and effective to find vitamin A from dietary sources.

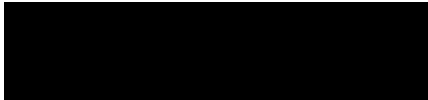
In terms of the Australian consumer, there is no need or appetite for genetically modified rice in this country. To the contrary, consumers in Australia appreciate excellent rice. The health impacts remain unknown, and allowing rice from overseas, that has only gone through a trial in Philippine conditions, is unacceptable. Testing and discussion in the Philippines (which I note is not even completed) should not be a means of allowing food products into Australia. This is not a high enough bar. Further, there has not been an appropriate level of public debate and disclosure within Australia about the potential for genetically modified rice to come into the

country. Rather, to allow GM rice into Australia, requires a full and open process and one that, I am sure, would generate significant negative feedback and high levels of concern were it known to the public more fully.

Please see the following reference:

Stone and Glover (2017) Disembedding grain: Golden Rice, the Green Revolution, and heirloom seeds in the Philippines, *Agriculture and Human Values*, 34(1) pp87-102.

Regards,



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