



7 July 2020

Project Manager
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on *Application A1199 Food derived from Innate potato lines V11 & Z6*.

Yours sincerely

A large black rectangular box redacting the signature of the Chief Executive.


Chief Executive



***Application A1199 Food derived from
Innate potato lines V11 & Z6***

**Submission by the New Zealand Food & Grocery
Council**

7 July 2020

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on *Application A1199 Food derived from Innate potato lines V11 and Z6*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

COMMENTS

3. This application, made by SPS International Inc (Idaho, USA), seeks inclusion of two potato lines for approval as food for sale in Australia and New Zealand. The modifications are intended to address production issues (disease resistance to foliar late blight) and, of greater relevance to food, reduced bruising from blackspot (and reduced food waste) and reduced acrylamide potential.
4. Reducing the acrylamide potential is effected by the conversion of starch and sucrose into the reducing sugars, glucose and fructose. By doing this, the production of acrylamide is then reduced when the potatoes are fried or baked. The intention is not for food containing these products to be exported to Australia or New Zealand but rather to protect international trade.
5. SPS International has previously made applications relating to similarly modified potatoes through applications A1128 (Sep 2016) and A1139 (July 2017). As with those applications, NZFGC considers this a continuation of significant developments relating to acrylamide mitigation since strategies are in place across many businesses in New Zealand for this purpose. Mitigation strategies that go to the raw food and its production, combined with measures during processing, are particularly effective in reducing the occurrence of acrylamide

Safety assessment

6. In relation to the characterisation of the transferred gene sequences, the changes sought are evident and there are no antibiotic resistance marker genes present in the line.
7. In relation to the compositional analyses, FSANZ reports that analyses were done of proximates, fibre, vitamins, minerals, total amino acids, free amino acids, sucrose, reducing sugars (fructose and glucose), and glycoalkaloids. The levels were compared to levels in the non-GM potato parental line, Snowden, and a reference range compiled from results taken for Snowden and other non-GM commercial varieties grown under the same or similar conditions and levels recorded in the literature. The conclusion was that tubers from potato lines V11 and Z6 are compositionally equivalent to tubers from conventional potato varieties. This is also the conclusion for the evaluation of intended and unintended changes.
8. FSANZ concluded that there were no potential public health or safety concerns identified in the assessment of potato lines V11 and Z6.

Labelling

9. Food derived from potato lines V11 and Z6 would be required to be labelled as 'genetically modified' if they contained novel DNA or novel protein. The genetic modification did not introduce any new proteins but the raw or cooked potato lines V11 and Z6 (including such processed products derived from V11 and Z6 tubers such as chips, crisps, potato starch) would contain novel DNA and would be likely to require labelling as 'genetically modified'.

Conclusion

10. In light of the foregoing, NZFGC notes that potato lines V11 and Z6 are safe for human consumption and we support its approval under Standard 1.5.2 of the *Australia New Zealand Food Standards Code* and its inclusion as an approved food under Schedule 26. We note that the raw or cooked potato lines V11 and Z6 and processed products derived from this such as chips, crisps, potato starch would contain novel DNA and are therefore likely to require labelling as 'genetically modified'.
11. Reducing the prospect of acrylamide occurring in processed foods, in this case potatoes, is a positive outcome and is strongly supported by NZFGC.