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To: NBT Consult Submissions <NBTConsultSubmissions@foodstandards.gov.au>
Subject: Consultation paper: Food derived using new breeding techniques

Consultation paper: Food derived using new breeding techniques
Submission from:
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Thank you for the invitiation to comment on the consultation paper. My responses to each question are below.

Q1: Do you agree, as a general principle, that food derived from organisms containing new pieces of DNA should be captured for pre-market safety assessment and approval? Should there be any exceptions to this general principle?

Response to Q1: Yes. The human and environmental impacts of foods (plants, animals, microorganisms) produced by new breeding technologies/genetic modification poses are unknown and unique. In addition to the expected changes, they may be prone to unexpected and potential heritable DNA changes. Thus it is appropriate and important to assess the GM production process for any foods produced by any genetic manipulation technique, including null segregants.

Q2: Should food from null segregant organisms be excluded from pre-assessment and approval? If yes, should that exclusion be conditional on specific criteria and what should those criteria be? If no, what are your specific safety concerns for food derived from null segregants?

Response:to Q2: No. see above

Q3. Are foods from genome edited organisms likely to be the same in terms of risk to foods derived using chemical or radiation mutagenesis? If no, how are they different? If yes, would this apply to all derived food products or are there likely to be some foods that carry a greater risk and therefore warrant pre-market safety assessment and approval?

Response to Q3: The risks are unknown. The work has not been done.

Q4 Are you aware of other techniques not currently addressed by this paper which have the potential to be used in the future for the development of food products? Should food derived from other techniques, such as DNA methylation, be subject to premarket safety assessment and approval?

Response to Q4: All gene modification techniques should be regarded in the same way.

Q5 Do you think a process-based definition is appropriate as a trigger for pre-market approval in the case of NBTs? If no, what other approaches could be used? If yes, how could a process-based approach be applied to NBTs? Are there any aspects of the current definitions that should be retained or remain applicable?

Response to Q5 : All foods produced by novel processes should trigger pre-market approvals.

Q6 Are there other issues not mentioned in this paper, that FSANZ should also consider, either as part of this Review or any subsequent Proposal to amend the Code?

Response to Q6: Other issues: Any such foods that are eventually released onto the market must be labelled.