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**Sent:** Sunday, 15 April 2018 4:34 PM  
**To:** submissions <submissions@foodstandards.gov.au>  
**Subject:** FSANZ Submission Form Received (Internet) - Karen Summerhays

Application/Proposal Number:	New breeding techniques (NBTs) change to code
Organisation Name:	Karen Summerhays
Organisation Type:	Individual
Representing:	GE Free Bay of Plenty
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Submission Text:	<p>I submit that the new technologies (CRISPR and the others mentioned in the consultation document) must be considered as a GMO. Independent scientists from Physicians and Scientists for Global Responsibility have warned that even though CRISPR is being touted as GE with 'precision and accuracy' there is still the risk of unintended genetic effects from these modifications. So any attempt to avoid regulation by pretending that the products of CRISPR are not GMO is problematic. This would allow novel</p>

untested and unmonitored CRISPR products to sidestep testing and labelling, the very opposite of what consumers want (myself included). The idea of deregulating the products of CRISPR when their safety can not be proved is not ok. It is vital to the public interest in New Zealand and Australia that we do not allow regulations to be altered to allow CRISPR products to escape the Gene Technology Act 2000 which defines gene technology as "any technique for the modification of genes or other genetic material". That includes CRISPR. Far from dropping regulation, CRISPR, like other GM foods should be subject to improved pre-market safety testing. New Zealand has built its economy as a food exporting nation, and a clean and green tourism destination. It is vital for brand New Zealand to maintain the highest food safety and monitoring standards including products from CRISPR.