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Quality Endorsed Company
ISO 9002 Ltd 348
Standards Australia

Dow AgroSciences

4th May 2010

Food Standards Australia New Zealand
PO Box 7186
CANBERRA BC
ACT 2610

Application to amend the food standards code – Dow AgroSciences Australia Pty Ltd AAD-12 Maize Soybean

Dear Sir, Madam,

Dow AgroSciences Australia Pty. Ltd wishes to seek an amendment to the Australian Food Standards Code (Standard 1.5.2) to include food ingredients which may be derived from herbicide tolerant DAS-68416-4 soybean line.

Dow AgroSciences considers this to be a major procedure under the FSANZ assessment procedures. This application is expected to confer and Exclusive Capturable Commercial Benefit.

This submission includes a dossier which addresses all the items identified by FSANZ as necessary to establish food safety and the supporting reports (as per section 3.5.1 of the FSANZ Application Handbook, 25th August, 2009). Only reports produced by Dow Agrosciences or The Dow Chemical Company are provided. All other citations are available but since these are from published literature have not been copied. Any or all of these citations will be forwarded if requested.

The references provided (listed in Attachment 1 to this letter) are proprietary information which is owned by and has value to Dow Chemical and their subsidiary Companies. These reports may not be used or referenced by any other company or person without our express agreement.

We also request that the following two reports be classed as Commercially Confidential Information based on the information it contains and therefore not be made available to the public.

Poorbaugh, J., Zhou, N. and Mo, J. (2009) Cloaning and Characterization of the DNA Sequence for the Insert and Flanking Border Regions of AAD-12 Soybean Event DAS-68416-4. Dow AgroSciences LLC Study ID 091048.

Smith-Drake, J.K., Sosa, M. and Shan, G. (2009) Method Validation for the Determination of Aryloxyalkanoate Dioygenase (AAD-12) Protein in Soybean Tissues by Enzyme-Linked Immunosorbent Assay. Dow AgroSciences LLC Study ID: 081008

With regards to crop residue data, the herbicides that will be sprayed on the crop are 2, 4-D and glufosinate. Crop residue data are not available for either chemical at present; however it is currently being compiled. We will provide it to FSANZ for the establishment of a MRL, as soon as it becomes available later this year.

Please find the following attached to this letter:

1) 2 paper copies of the application dossier including 2 paper copies of Attachment 1 – Dow AgroSciences or The Dow Chemical Company produced reports.
2) 2 paper copies of Attachment 2 – Confidential Commercial Information.
3) CD with an electronic version of the application dossier including Attachment 1.
4) CD with Attachment 2 – Confidential Commercial Information.
5) Required Statutory Declaration.
6) Completed checklist.

Yours faithfully,

Sarah Russell French
Regulatory Specialist ANZ
Regulatory Sciences and Government Affairs
Dow AgroSciences Australia