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To FSANZ

From Auckland GE-Free Coalition (AGEFC)



A1274 GM Banana

Thank you for the opportunity to submit on this application.

AGEFC is a network of community members and groups concerned for the regulation of GMOs in the public interest.

The documents provided by FSANZ in this call for submissions lack information needed to assess the risks to health from unique characteristics of the GM banana.

The FSANZ report makes it clear that assumptions of safety have been made without the necessary scientific data.

There is no analysis of seven new proteins identified in the GM banana.

There is no research on the implications of these proteins for food safety when the banana is eaten.

Until proper data and analysis is available A1274 GM Banana must be declined.

AGEFC submit that no approval of application A1274 is made until robust scientific safety testing is conducted.

This application does not provide adequate information relating to food safety for FSANZ experts or other submitters to consider.

In particular FSANZ is asked to require safety data from the applicant to address concerns.

Gaps in FSANZ's work that are revealed in the public and other documents released under the OIA.

The information provided does not give the public confidence on the effective, transparent, and accountable regulatory framework assessment.

Documents received under the FOIA include:

- 1 Event: [FOI - Safety assessment – Application A1274](#) Food derived from disease-resistant banana line QCAV-4.
- 2 Event: [FOI - Fusarium Wilt Tropical Race 4 Resistant Banana Event QCAV-4](#)
- 3 Event: [FOI - Studies submitted in support of Fusarium Wilt Tropical Race 4 Resistant Banana Event QCAV-4](#)
- 4 Event: [FOI - Banana event QCAV-4 Collection of nucleotide and amino acid sequences](#)
- 5 Event: FOI - [Banana Event QCAV-4 Composition Analysis](#)

FSANZ are asked to refuse approval until significant scientific and safety issues are addressed with data, not based on assumed safety.

The issues to be addressed before the application can be reasonably and legitimately assessed include

The GM bananas will contain a gene for expressing antibiotic resistance. If transferred to gut bacteria this could add to problems of bacterial resistance to kanamycin-type antibiotics.

- There is a lack of evidence on the impact of different medicines that change the survival rate of GM constructs into the gut and bloodstream of consumers.
- There is no study of different impact for infants, children, the sick or elderly from eating the GM bananas.
- Requiring laboratory diagnostic tests for detection of the transgenes be made available for health professionals before any approval of the product.
- Requiring Scientific evidence on long term safety of consumption of the GM banana.

Until there is scientific data on the any effects of the transgenes and inflammatory response in small bowel flora, villi and epithelium, in long-term studies, the GM banana must be declined.

Please keep us informed.