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8 November 2023

Submission to FSANZ

FSANZ – Application A1274 Food derived from disease-resistant banana line QCAV-4

Submission by:

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Thank you for the opportunity to make a submission, so that together we can achieve sound public health and safety outcomes, and protect consumer choice and "right to know".

We have concerns about this particular application and the risks of GE/GM bananas not only to the biosecurity of Australia but to NZ and Australian consumers. We work to protect the public health and consumer "right to know", as well as the right of Kiwis to eat GE/GM free food.

We support GE Free NZ in food & environment (and other key stakeholders in Australia and New Zealand) who have lodged submissions with FSANZ in response to this particular controversial application. They have requested the 'clock be stopped' on application A1274 until robust scientific safety testing is conducted and we support this request.

In our and other submitters view, the A1274 GM Banana application must be declined. We are surprised that FSANZ would even consider an application in which the applicant is proposing the outdoor use of a controversial viral promoter (Cauliflower mosaic virus) and a gene for expressing antibiotic resistance

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

- 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.
- 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 impacts on infants, children, the sick or elderly from consuming the GM bananas.
- Until there is scientific data on the effects of the transgenes and inflammatory response in small bowel flora, villi and epithelium, in long-term studies, the GM banana must be declined.
- FSANZ must require laboratory diagnostic tests for detection of the transgenes be made available for health professionals before any approval of the product.
- Scientific evidence on long term safety of consumption of the GM

banana must be required.

- The information provided by FSANZ to date does not give the public confidence on the effective, transparent, and accountable regulatory framework assessment.
- We have ongoing concerns about inadequate GE/GMO labelling in New Zealand. GMOs include imported processed foods that are derived from controversial GE edited foods. Gene edited organisms are GMOs (these are not permitted in New Zealand).
- We wish to be heard. Please keep us informed.