

Project Officer Application A1274
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6036

6 November 2023

Tēnā koe,

A1274 - Food derived from disease-resistant banana line QCAV-4

Thank you for the opportunity to comment on this application.

New Zealand Food Safety (NZFS) has reviewed the safety assessment and makes this submission in consultation with the New Zealand Environmental Protection Authority (NZEPA), and Biosecurity New Zealand. NZFS has requested an independent assessment by the Institute of Environmental Science and Research (ESR).

NZFS and ESR agree with FSANZ's safety and risk assessment that concluded that no potential public health and safety concerns were identified in the assessment of disease-resistant banana line QCAV-4, and that food derived from banana line QCAV-4 is as safe for human consumption as food derived from conventional banana varieties.

NZFS supports the draft variation to amend:

- Schedule 26—3(4) of the Food Standards Code, to permit the sale and use of food derived from disease-resistant banana line QCAV-4 as a genetically modified (GM) food in accordance with Standard 1.5.2.
- Subsection 1.2.1—9(3) of the Food Standards Code, so that information about GM food would have to be provided for whole or cut fresh fruit and vegetables (other than seed sprouts or similar products) in a package that does not obscure the nature or quality of the food. The Food Standards Code already requires both packaged food for sale and food for sale that is not required to bear a label and is not in a package to provide information about GM food.

NZFS notes the applicant has stated that Australia's banana industry mainly serves the domestic market and therefore fresh fruit derived from the GM banana is unlikely to be exported and sold in New Zealand if approved to be cultivated in Australia. However, if the fresh GM banana fruit were to be imported into New Zealand, approval may be required under the Hazardous Substance and New Organisms (HSNO) Act 1996. Food businesses intending to export/import fresh GM banana to/into New Zealand will need to consult with NZEPA.

Processed GM banana products including dried or frozen bananas, or foods containing the GM banana as an ingredient, would be able to be imported into New Zealand as these foods are not viable organisms and therefore are not subject to the requirements of the HSNO Act. The importation of fresh GM banana fruit and processed GM banana products into New Zealand must meet the import health standard (IHS) requirements under the Biosecurity Act 1993. Any GM banana or GM banana ingredients in food would need to be labelled as being genetically modified, which enables informed consumer choice.

We have the following specific comments on this application:

Call for submissions document

- We would like to provide more information in footnote 3 on page 4. The HSNO Act 1996 is administered by the New Zealand Ministry for the Environment with the NZEPA responsible for assessing and approving new organisms before they are allowed into New Zealand. The Ministry for Primary Industries (MPI) is responsible for enforcing the new organism provisions of the HSNO Act 1996 at the border and ensuring no unapproved GM material enters the country under the Biosecurity Act 1993.

Safety assessment document SD1

- Given that the banana is a recognised allergenic food and that several of the major allergens in bananas have been identified, it would be useful for the assessment to comment on whether any studies have identified R-proteins among the known banana allergens.
- The inclusion of only a single field site in the production of test material for compositional comparisons is a shortcoming of the application, although this is partially addressed by the inclusion of material from multiple years/generations.
- For the compositional analysis of the GM banana line QCAV-4 and the control Grand Nain, there was a relatively narrow range of components (10) being analysed compared to other GM food assessments. Given the relatively high sugar content of bananas (~15%), the comparison of the sugar contents and composition of QCAV-4 and the Grand Nain may be a useful additional check that no unintended compositional changes have resulted from the genetic modification.
- We suggest a global spelling change from “publically” to “publicly”.

NZFS welcome any questions on issues raised in our submission.

Nāku noa, nā

