

HEALTH PROTECTION DIRECTORATE

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Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

Dear Sir / Madam

Submission – Application A1035 – Food derived from Insect-protected Soybean Line MON 87701

Thank you for the opportunity to provide a submission on the Assessment Report (AR) for Application A1035.

Queensland Government overview of genetically modified (GM) food

The Queensland Government is supportive of the move towards legislation that deals with genetically modified (GM) organisms. The Government considers it important that advances in science and technology are not impeded if it is shown that these advances do not harm human health or the environment.

With respect to the commercial production of GM crops, the Queensland Government has not imposed a moratorium and has developed a policy framework for coexistence of GM and non-GM crops, with the use of GM crops considered on a case by case basis.

The use of GM food is also considered on a case by case basis, with particular consideration and relevance to human health.

Role of Queensland Health

This is a whole of Queensland Government response and is made by Queensland Health since it is the lead agency in Queensland which coordinates policy advice relative to the national policy on food regulation. Our approach follows consultation with other relevant Queensland Government agencies.

Issues relative to this Application

Although other relevant Queensland Government stakeholders have indicated they have no issues relative to this Application, Queensland Health has identified a number of issues and concerns and these will need to be considered.

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On page 2 of the AR we note, *“Insect-protected soybean line MON 87701 is intended for commercialisation in South America. The applicant has submitted a food and feed safety and nutritional assessment summary to the US Food and Drug Administration and a request for a determination of nonregulated status from the US Department of Agriculture. Food, feed and environmental submissions were made to the Canadian Food Inspection Authority, Health Canada and a cultivation submission was made to Brazilian National Biosafety Technical Commission. The applicant also applied to the European Food Safety Authority for food and feed use of imported MON 87701.”*

We would appreciate advice as to when the above submissions were made, the progress of these submissions and the anticipated timelines for the determinations relative to these issues.

On page 3 of the AR we note, *“Regulatory submissions have been or will be made to significant importers of soybean or processed soybean fractions. These include the Ministry of Agriculture in China, the Ministry of Health, Labor and Welfare and the Ministry of Agriculture, Forestry and Fisheries in Japan, as well as the Food and Drug Administration and the Rural Development Administration in the Republic of Korea.”*

We note in the above there is an inclusion of China, Japan and the Republic of Korea. We would appreciate the complete list of countries where regulatory submissions have been made or are intended to be made, when these submissions were or will be made, the progress of the above submissions and the anticipated timelines for the determinations.

It is noted that FSANZ has relied significantly on Monsanto Study Reports to progress this Monsanto Application. Accordingly we remain concerned that the scientific safety assessment can be viewed as not being independent.

Queensland Health sees little in the way of detail associated with the benefit-cost analysis and seeks access to the advice provided by FSANZ to the Office of Best Practice Regulation relative to the assessment of this Application.

Furthermore, Queensland Health is concerned that a decision to approve this genetically modified food will impact on monitoring resources for our jurisdiction. The 2003 National Genetically Modified (GM) Food Labelling Pilot Survey clearly demonstrated that GM testing is expensive and each new GM approval adds to this cost.

We are also aware that the Council of Australian Governments and the Australia and New Zealand Food Regulation Ministerial Council have agreed to undertake a comprehensive review of food labelling law and policy and that a Study relative to GM food is being finalised by Dr Judy Carman.

In light of the above, it is suggested that this Application be deferred until the outcomes of the Food Labelling Review and the Study by Dr Judy Carman are known.

Yours sincerely

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