

HEALTH PROTECTION DIRECTORATE

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File Number: QCHO/002343 part 1
Our Ref.:

25 January 2010

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

Dear Sir / Madam

Submission – Application A1041 – Food derived from SDA Soybean Line MON87769

Thank you for the opportunity to provide a submission on the First Assessment Report for Application A1041.

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 requests these be considered.

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In Section 2.2 of the First Assessment Report we note, "*Submissions on soybean line MON87769 have been made to the appropriate agencies for food, feed and environmental approvals in the United States (Food and Drug Administration, Department of Agriculture – Animal and Plant Health and Inspection Service) and Canada (Health Canada and the Canadian Food Inspection Agency). An import submission for food and feed use has been made to the European Food Safety Authority.*"

In addition, regulatory submissions have or will be made to government agencies in Japan (Ministry of Health, Labour and Welfare, Ministry of Agriculture, Forestry and Fisheries), China (Ministry of Agriculture), and Korea (Rural Development Administration, Korea Food and Drug Administration)."

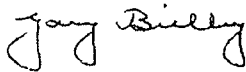
We would appreciate advice on the progress of these applications and the anticipated timelines for the determinations relative to these applications.

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 could be viewed as not being independent.

There appears to be little detail presented in the benefit-cost analysis. Accordingly we would appreciate the advice provided by FSANZ to the Office of Best Practice Regulation relative to the assessment of this Application in order to understand how the result of the benefit-cost analysis was reached.

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. Queensland Health therefore remains concerned with respect to this.

Yours sincerely



Gary Bielby
Principal Environmental Health Officer
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