

HEALTH PROTECTION DIRECTORATE

Enquiries to: Gary Bielby
Principal Environmental Health
Officer, Food Safety Policy and
Regulation Unit,
Environmental Health Branch
Telephone: 07 3328 9324
Facsimile: 07 3328 9354
Email: gary_bielby@health.qld.gov.au
File Number: QCHO/2622 part 1
Our Ref.: GB110040

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

Dear Sir / Madam

Submission – Application A1046 – Food derived from herbicide-tolerant soybean line DAS-68416-4

Thank you for the opportunity to provide a submission on the 1st Assessment Report (1st AR) for Application A1046.

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.

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Office
Level 1, 15 Butterfield Street
Herston QLD 4006

Postal
PO Box 2368
Fortitude Valley BC QLD 4006

Phone
(07) 3328 9324

Fax
(07) 3328 9354

Issues relative to this Application

Although other relevant Queensland Government agencies have not indicated they have any issues relative to this Application, Queensland Health has identified a number of matters and concerns and would appreciate if these could be considered.

It is noted on page 2 of the 1st AR, "*Applications concerning soybean line DAS-68416-4 have been made to the appropriate agencies for food, feed and/or environmental approvals in the United States, Canada, South Korea, Taiwan, Argentina and the European Union.*" We would appreciate advice on the progress of these applications and the anticipated timelines for the determinations.

It is also noted on page 5 of the 1st AR, "*For soybean line DAS-68416-4, there is methodology involving the use of the polymerase chain reaction for DNA detection. Additionally, the Applicant has developed immunoassay technology for detection of the AAD-12 protein. A description of this technology has been supplied to FSANZ but is Confidential Commercial Information. Because of the technology involved, these detection methods are likely to be restricted to specialist laboratories.*" Queensland Health would appreciate this methodology and technology being provided to Queensland Health Forensic and Scientific Services.

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

We would also 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, given it is noted that limited detail is presented.

Yours sincerely

Gary Bielby
Principal Environmental Health Officer
Food Safety Policy and Regulation Unit
Environmental Health Branch