

Australian Food and Grocery Council
SUBMISSION

28 MARCH 2011

TO:
FOOD STANDARDS AUSTRALIA NEW ZEALAND

IN RESPONSE TO:
**A1046 - FOOD DERIVED FROM HERBICIDE-TOLERANT
SOYBEAN LINE DAS-68416-4.**



Australian Food and Grocery Council

PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

Membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors. (A full list of members is included as Appendix A.)

AFGC's aim is for the Australian food, beverage and grocery manufacturing industry to be world-class, sustainable, socially-responsible and competing profitably domestically and overseas.

With an annual turnover of \$102 billion (see chart), Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector¹ is Australia's largest and most important manufacturing industry, four times larger than the automotive parts sector – the food and grocery manufacturing industry is a vital contributor to the wealth and health of our nation. Representing 28 per cent of total manufacturing turnover, the sector is comparable in size to the Australian mining sector.

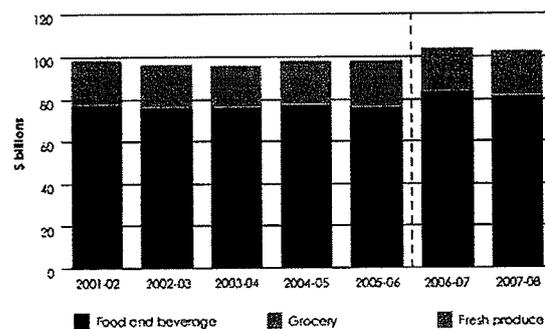
The industry's products are in more than 24 million meals, consumed by 22 million Australians every day, every week and every year. The food and grocery manufacturing sector employs more than 288,000 people representing about 3 per cent of all employed people in Australia paying around \$13 billion a year in salaries and wages.

The growing and sustainable industry is made up of 38,000 businesses and accounts for \$44 billion of the nation's international trade. The industry's total sales and service income in 2007-08 was \$102 billion and value-added increased to nearly \$27 billion². The industry spends about \$3.8 billion a year on capital investment and over \$500 million a year on research and development.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia³.

It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Figure 1. Industries turnover (2007-8)



Source: ABS, catalogue number 8221.0 and 6159.0

¹ Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc..

² AFGC and KMPG. *State of the Industry 2010*. Essential information: facts and figures. Australian Food and Grocery Council. Oct 2010.

³ About Australia: www.dfat.gov.au



1. INTRODUCTION

AFGC welcomes the opportunity to make this submission to the Food Standards Australia New Zealand in response to the assessment report for Application A1046 - Food derived from Herbicide-tolerant Soybean Line DAS-68416-4.

AFGC notes the intent of this application is to amend Standard 1.5.2 – Food produced using Gene Technology, in the Australia New Zealand Food Standards Code, to permit the sale and use of food derived from soybean line DAS-68416-4, conferring herbicide-tolerance.

The AFGC supports this application on the basis that there is no identified risk to public health and safety, and that it is then up to companies and individuals to make their own independent commercial decisions as to whether or not to use this product.

Recommendation

That FSANZ propose amending Table to clause 2 in Standard 1.5.2 – Food produced using Gene Technology to include food derived from *Herbicide-tolerant Soybean Line DAS-68416-4*.

2. SPECIFIC COMMENTS

2.1. The Application

AFGC notes that the first assessment report has considered the genetic modification used in this plant, the potential toxicity and allergenicity of the novel protein, and the comparison of the genetically modified plant with that of a conventional plant.

FSANZ did not identify any public health and safety concerns, and concluded that food derived from soybean line DAS-68416-4 is as safe and wholesome as the equivalent commercial counterpart, and there were no compositional differences of biological significance compared to conventional (non-GM) soybean cultivars.

2.2. Consumer information

AFGC considers the current regulatory arrangements for foods derived from gene technology ("GM Foods"; Australian New Zealand Food Standards Code *Standard 1.5.2 Foods Produced using Gene Technology*) are appropriate to **ensure protection of public health and safety** and adequate information to consumers for informed choice.

The labelling of GM food is not a safety issue. It is solely related to the nature, extent and practicalities of providing information for informed consumer choice.

Current labelling regulations require food to be labelled when it contains genetically modified (GM) material or when the food is materially modified through the use of gene technology. The regulations

Australian Food and Grocery Council
SUBMISSION

also recognise, however, the need for flexibility through exemptions and thresholds, in a way which does not undermine the effectiveness of providing for informed consumer choice.

These provisions are necessary as the food supply chain whilst highly sophisticated cannot guarantee absolute segregation of ingredients all the time resulting in occasional trace (i.e. less than 1%) accidental presence of GM material. The provisions also recognise that if a company determines not to use GM ingredients and has production processes which for the vast majority of the time deliver non-GM foods, the occasional accidental presence should not render the company non-compliant with food labelling regulations.

The AFGC Product Information Form (PIF) may be of assistance to companies in identifying GM ingredients, and components of ingredients, and to ensure compliance with labelling requirements.

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APPENDIX A

Membership as at 25 March 2011

Arnott's Biscuits Limited	Kimberly-Clark Australia Pty Ltd	AT Kearney
Asia-Pacific Blending Corporation P/L	Kraft Foods Asia Pacific	BRI Australia Pty Ltd
Barilla Australia Pty Ltd	Laucke Flour Mills	*Baking Association Australia
Beak & Johnston Pty Ltd	Lion Nathan National Foods Limited	CAS Systems of Australia
Beechworth Honey Pty Ltd	Madura Tea Estates	CHEP Asia-Pacific
Beerenberg Pty Ltd	Manildra Harwood Sugars	CSIRO Food and Nutritional Sciences
Bickfords Australia	Mars Australia	CoreProcess (Australia) Pty Ltd
BOC Gases Australia Limited	McCain Foods (Aust) Pty Ltd	CROSSMARK Asia Pacific
Bronte Industries Pty Ltd	McCormick Foods Aust. Pty Ltd	Dairy Australia
Bulla Dairy Foods	McDonald's Australia	Food Liaison Pty Ltd
Bundaberg Brewed Drinks Pty Ltd	Merisant Manufacturing Aust. Pty Ltd	FoodLegal
Bundaberg Sugar Limited	Nerada Tea Pty Ltd	*Foodservice Suppliers Ass. Aust.
Byford Flour Mills T/a Millers Foods	Nestlé Australia Limited	*Food industry Association QLD
Campbell's Soup Australia	Nutricia Australia Pty Ltd	*Food industry Association WA
Cantarella Bros Pty Ltd	Ocean Spray International Inc	Foodbank Australia Limited
Cerebos (Australia) Limited	Parmalat Australia Limited	*Go Grains Health & Nutrition Ltd
Cheetham Salt Ltd	Patties Foods Pty Ltd	Grant Thornton
Christie Tea Pty Ltd	Procter & Gamble Australia Pty Ltd	GS1
Church & Dwight (Australia) Pty Ltd	Queen Fine Foods Pty Ltd	Harris Smith
Clorox Australia Pty Ltd	QSR Holdings	IBM Business Cons Svcs
Coca-Cola Amatil (Aust) Limited	Reckitt Benckiser (Aust) Pty Ltd	innovations & solutions
Coca-Cola South Pacific Pty Ltd	Safcol Canning Pty Ltd	KN3W Ideas Pty Ltd
Colgate-Palmolive Pty Ltd	Sanitarium Health Food Company	KPMG
Coopers Brewery Limited	Sara Lee Australia	Leadership Solutions
Danisco Australia Pty Ltd	SCA Hygiene Australasia	Legal Finesse
Devro Pty Ltd	Schweppes Australia	Linfox Australia Pty Ltd
DSM Food Specialties Australia Pty Ltd	Sensient Technologies	Logan Office of Economic Dev.
Earlee Products	Simplot Australia Pty Ltd	Meat and Livestock Australia Limited
Eagle Boys Pizza	Spicemasters of Australia Pty Ltd	Monsanto Australia Limited
FPM Cereal Milling Systems Pty Ltd	Stuart Alexander & Co Pty Ltd	New Zealand Trade and Enterprise
Ferrero Australia	Subway	RQA Asia Pacific
Fibrisol Services Australia Pty Ltd	Sugar Australia Pty Ltd	StayinFront Group Australia
Fonterra Brands (Australia) Pty Ltd	SunRice	Strikeforce Alliance
Food Spectrum Group	Swift Australia Pty Ltd	Swire Cold Storage
Foster's Group Limited	Tasmanian Flour Mills Pty Ltd	Swisslog Australia Pty Ltd
Frucor Beverages (Australia)	Tate & Lyle ANZ	The Food Group Australia
General Mills Australia Pty Ltd	The Smith's Snackfood Co.	The Nielsen Company
George Weston Foods Limited	The Wrigley Company	Touchstone Cons. Australia Pty Ltd
GlaxoSmithKline Consumer Healthcare	Tixana Pty Ltd	Valesco Consulting FZE
Go Natural	Unilever Australasia	Visy Pak
Goodman Fielder Limited	Vital Health Foods (Australia) Pty Ltd	Wiley & Co Pty Ltd
Gourmet Food Holdings	Ward McKenzie Pty Ltd	
H J Heinz Company Australia Limited	Wyeth Australia Pty Ltd	
Harvest FreshCuts Pty Ltd	Yakult Australia Pty Ltd	
Healthy Snacks	Yum Restaurants International	
Hela Schwarz		
Hoyt Food Manufacturing Industries P/L		
Hungry Jack's Australia		
Jalna Dairy Foods Pty Ltd		
Johnson & Johnson Pacific Pty Ltd		
Kellogg (Australia) Pty Ltd		
Kerry Ingredients Australia Pty Ltd		
	Associate & *Affiliate Members	
	Accenture	
	Australian Pork Limited	
	ACI Operations Pty Ltd	
	Ancor Fibre Packaging	
	*ASMI	
		PSF Members
		Ancor Packaging Australia
		Bundaberg Brewed Drinks Pty Ltd
		Schweppes Australia Pty Ltd
		Coca-Cola Amatil (Aust) Limited
		Foster's Group Limited
		Golden Circle Limited
		Lion Nathan Limited
		Owens Illinois
		Visy Pak

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