

25 March 2011

Project Officer Application A1046
Food Standards Australia New Zealand
PO Box 10559
The Terrace
WELLINGTON 6036

FS350-117-1046

Dear Sir/Madam

Application A1046 – Food Derived from Herbicide-tolerant Soybean Line DAS-68416-4 – First Assessment Report

Thank you for the opportunity to comment on this application. The Ministry of Agriculture and Forestry (MAF) has the following comments to make.

MAF agrees with the FSANZ conclusion that no public health or safety concerns have been identified.

We do however have suggestions concerning section 5 (Herbicide metabolites) of the Safety Assessment Report. The key consideration of this section of the report should be the determination that the metabolism of the 2,4-D residue is comparable to that of conventional crops, since if so the risks from the residue would not exceed those deemed acceptable during the establishment of the agricultural chemical Maximum Residue Limit.

In this application it is stated that the amount of DCP residue present in DAS-68416-4 is the same as that found in conventional crops, although no data from conventional crops are presented in the safety assessment report to demonstrate this or allow a direct comparison to be made. The inclusion of this data would improve the report.

Yours sincerely

Jenny Reid
Manager Food Safety
Science, Information & Risk Directorate