

Meier, David

From: Emma Burchell [technical@chc.org.au]
Sent: Monday, 28 March 2011 2:17 PM
To: submissions
Cc: Kristy Tomas
Subject: CHC - Submission A1049
Attachments: CHC Submission GMO Soybean 28 March 2011.pdf

To the Standards Management Officer,

Please find attached the Complementary Healthcare Councils submission on application ; A1049.

Kind regards,

Emma Burchell | BHSc(Complementary Medicine) | ND(Adv) | Technical Officer| Complementary Healthcare Council of Australia

Sustainable health | enhanced wellness | naturally

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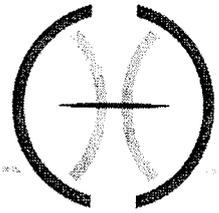
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Further information will available in due course. Please contact Soome Dimmock with any queries on events@chc.org



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Food Standards Australia New Zealand
PO Box 7186
CANBERRA ACT 2610
AUSTRALIA

28 March 2011

Dear Sir/Madam,

CHC Submission – Application A1049-Food derived from Herbicide-tolerant, High Oleic Acid Soybean Line MON87705.

Thank you for providing the opportunity for the complementary healthcare industry to comment on the above consultation papers dated 14 February 2011.

The Complementary Healthcare Council (CHC) is the leading expert association exclusively committed to a vital and sustainable complementary healthcare products industry. We are unique in representing all stakeholder groups in the complementary healthcare industry; our members include importers, exporters, raw material suppliers, manufacturers, wholesalers, distributors, retailers, practitioners, consultants, direct marketers, multi-level marketers and consumers. The CHC is the principal reference point for members, government, the media, and consumers to communicate about issues relating to the complementary healthcare industry.

General Comments on Application A1049

- The CHC generally supports the applications for GMO soybean providing adequate labelling provisions are established to ensure consumers can make informed choices when purchasing food products. This concern can be addressed by the objective set out in paragraph 18(1)(b) of the *FSANZ Act*; that is, the provision of adequate information relating to food to enable consumers to make informed choices.
- Application A1049 states that food derived from MON87705 soybean will be required to be labeled as 'genetically modified', **irrespective of whether novel DNA or protein are present in the final food**. That is food derived from soybean line DAS-68416-4 will be required in the ingredients list or in conjunction with the name of the food. The CHC supports this proposed labelling.
- In monitoring compliance to the labelling provisions, the CHC notes that the cost of resourcing this would be comparable whether or not the GM food is approved i.e. the labelling provisions should not be costly and therefore prohibitive to implement.

- Lastly, the CHC notes that the cultivation of any GM crop in Australia and New Zealand could have an impact on the environment. As stated, an independent assessment would be required by the Office of Gene Technology Regulator in Australia before commercial release could be permitted. The CHC encourages a sustainable complementary food product industry and as such does not support any restrictions to international trade on soybeans.

If you would like to discuss any of the matters raised in this submission, please do not hesitate in contacting me further.

A handwritten signature in black ink, appearing to read 'K. Tomas'.

Kristy Tomas
Scientific & Regulatory Affairs Manager