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Sent: Monday, 28 March 2011 1:48 PM
To: submissions
Cc: Kerrin Domoney; Zena Dinesen; Tenille Fort
Subject: Submission - Assessment Report - Application A1049 - Food derived from herbicide-tolerant, high oleic acid soybean line MON87705
Attachments: GB110039_LT_A1049_Assessment Report_FSANZ.doc
Categories: Orange Category

Attn: Standards Management Officer

Dear Sir/Madam

Please find attached a submission concerning the above Application.

Regards

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HEALTH PROTECTION DIRECTORATE

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File Number: QCHO/2764 part 1
Our Ref.: GB110039

28 March 2011

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

Dear Sir / Madam

Submission – Application A1049 – Food derived from herbicide-tolerant, high oleic acid soybean line MON87705

Thank you for the opportunity to provide a submission on the Assessment Report (AR) for Application A1049.

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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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 3 of the AR, *"A food and feed safety and nutritional assessment summary for MON87705 was submitted to the United States Food and Drug Administration (FDA) in October 2009. A request for a Determination of Nonregulated Status for MON87705 including all progenies derived from crosses between MON87705 and other soybean varieties, from the United States Department of Agriculture- Animal and Plant Health and Inspection Service was made in July 2009."* We would appreciate advice on the progress of these matters and the anticipated timelines for the determinations.

It is also noted on page 3 of the AR, *"Regulatory submissions have been, or will be, made to a number of countries that import functional regulatory systems in place."* It would be appreciated if further information about these regulatory submissions and the countries involved was provided.

We note on page 7 of the AR, *"For MON87705 soybean, the complete nucleotide sequence of the inserted DNA and junction regions has been provided without confidentiality restrictions. This would enable specialist laboratories experienced in polymerase chain reaction (PCR) analysis to develop an event-specific protocol for the detection of novel DNA characteristic of MON87705 soybean."* It would be appreciated if the detection methodology for this GM food could be provided to Queensland Health Forensic and Scientific Services.

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.

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.

Yours sincerely

Gary Bielby
Principal Environmental Health Officer
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Environmental Health Branch