

HEALTH PROTECTION DIRECTORATE

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File Number: QCHO/2882 part 1
Our Ref.: GB110104

29 September 2011

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

Dear Sir / Madam

Submission – Application A1051 – Food derived from herbicide-tolerant soybean line FG72

Thank you for the opportunity to provide a submission on the Assessment Report (AR) for Application A1051.

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.

Issues relative to this Application

Although other relevant Queensland Government agencies have not identified any issues relative to this Application, Queensland Health raises some matters and would appreciate if these could be considered.

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It is noted in the AR there is a reference to “cotton” and “cottonseed” when it was understood this Application relates to soybean. The references are:

“Based on information provided by the Applicant on the nature of the genetic modification, the molecular characterisation, the characterisation of the novel proteins, the compositional analysis and consideration of any nutritional issues, is food derived from soybean line FG72 comparable to food derived from conventional cultivars of cotton in terms of its safety for human consumption?” (page 3 of the AR); and

“Consumers: Possible restriction in the availability of imported cottonseed products to those products that do not contain soybean line FG72”. (page 8 of the AR)

It is noted on page 3 of the AR, *“Applications concerning soybean line FG72 have been made to the appropriate agencies for food, feed and/or environmental approvals in the United States (Food and Drug Administration, Department of Agriculture, Environmental Protection Agency), Canada (Health Canada, Canadian Food Inspection Agency) and Korea (Food and Drug Administration, Rural Development Administration). These applications are still currently under consideration. Further applications for food import approvals in other key international markets may also be made.”* We would appreciate advice on the progress of these matters as to the status in other countries.

In addition, it is noted the Implementation Sub-Committee has agreed to the formation of an Expert Advisory Group, involving laboratory personnel and representatives of the Australian and New Zealand jurisdictions that would identify and evaluate appropriate methods of analysis associated with all applications to FSANZ, including GM applications. Concern is expressed that FSANZ Applications continue to be progressed when this group has not yet been formed to ensure analytical capability.

It was recently noted the European Court of Justice has ruled that honey and food supplements containing pollen derived from a genetically-modified organism cannot be marketed in the European Union without prior authorisation. Given Supporting Document 1 makes reference to bee pollen that may be derived from the soybean plant, does this ruling have any impact on the Application, in particular any labelling aspects?

It is noted *“The Office of Best Practice Regulation (OBPR), in a letter to FSANZ dated 24 November 2010 (reference 12065) provided an exemption from the need of the OBPR to be informed about GM food applications made to FSANZ”* (page 6 of the AR). It would be appreciated if a copy of this letter could be made available so that it can be understood why this exemption is granted for GM food applications.

Yours sincerely

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