

**Organic Federation Of Australia Ltd (OFA) re Submission on
Application A1085 – Food Derived from Reduced Lignin Lucerne Line
KK179**

Organic Federation Of Australia Ltd (OFA) is aware of the submission to FSANZ prepared by Organic Dairy Farmers Australia (ODFA), and concurs with the points raised and conclusions contained within that submission.

In particular, Organic Federation Of Australia Ltd (OFA) is concerned that the safeguards available to protect organic and conventional farmers are wholly inadequate in the face of GMO contamination risks. Although Organic Federation Of Australia Ltd (OFA) is particularly concerned about the cultivation of GM crops in Australia, Organic Federation Of Australia Ltd (OFA) is increasingly concerned about the evidence identified in ODFA's submission of volunteer and feral populations of GMOs in countries that have never cultivated GMOs. Organic Federation Of Australia Ltd (OFA) believes that if Lucerne Line KK179 is authorised for importation to Australia, there is a strong risk of volunteer and feral populations becoming established which could put Australia's organic and dairy industries at significant risk.

Organic Federation Of Australia Ltd (OFA) is also concerned about the potential impacts of Lucerne KK179 on public health and safety. Organic Federation Of Australia Ltd (OFA) agrees with ODFA's submission that FSANZ erred in failing to take into account the risks to human health posed by:

- a) chemical residue on Lucerne KK179 imported from the United States;
- b) stacking GM traits of Lucerne KK179 with Lucerne J101 and J163;
- c) livestock fed with Lucerne KK179 and the potential health risks to humans of consuming of animal products from those animals; and
- d) the environmental impacts of the introduction of Lucerne KK179 into the environment, including impacts on biodiversity.

Organic Federation Of Australia Ltd (OFA) strongly concurs with ODFA's submission that the importation of Lucerne KK179 puts the organic market at unacceptable risk, and will also disadvantage consumers.

Organic Federation Of Australia Ltd (OFA) submits that for these reasons, as further explained in ODFA's submission, the Application should be rejected.

Recommendation: Option 2 – Reject Application

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