

17 December 2013

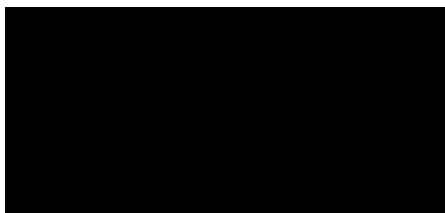
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for Submissions – Application A1087 Food derived from Insect-protected Soybean Line DAS-81419-2.***

Yours sincerely



Katherine Rich  
**Chief Executive**

**Food Standards Australia New Zealand**  
**APPLICATION A1087 FOOD DERIVED FROM INSECT-PROTECTED**  
**SOYBEAN LINE DAS-81419-2**

**Call for Submissions**

**17 December 2013**

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to make a submission on *Application A1087 Food derived from Insect-protected Soybean Line DAS-81419-2*.

**New Zealand Food & Grocery Council**

The NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. Collectively this sector generates over \$28 billion in the New Zealand domestic retail food, beverage and grocery products market and over \$26 billion in export revenue from exports to 183 countries. Food and beverage manufacturing is the largest manufacturing sector in New Zealand representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages.

Food and beverage manufacturing and wholesaling in New Zealand directly employs over 100,000 people (5% total employment) and, when taking the wider food and beverage value chain (including farming and food retailing/foodservice) into account, employment soars to almost 350,000 in over 85,000 enterprises. This represents around one in five people employed in our country.

No matter how you look at it, the New Zealand food, beverage and grocery sector makes a substantial contribution to the New Zealand domestic economy, to our exports and to the general economic well-being of the country.

**Application A1087**

The NZFGC understands that the soybean line DAS-81419-2 is protected against several moth and butterfly (lepidopteran) pests including soybean looper, velvetbean caterpillar, fall armyworm and tobacco budworm. The protection is achieved through introduction of two insecticidal genes termed *cry1Ac(synpro)* and *cry1Fv*, both derived from the common soil bacterium *Bacillus thuringiensis*. The proteins expressed by the genes are identical in amino acid sequence to the same proteins expressed in WideStrike cotton considered by FSANZ in Application A518 (FSANZ, 2005). The soybean also contains a PAT (phosphinothricin acetyltransferase) marker from the soil bacterium *Streptomyces viridochromogenes*. While soybean line DAS-81419-2 is also therefore tolerant to the herbicide glyphosate, it is not intended this trait will be used in commercial production of the soybean line DAS-81419-2.

**Comments**

NZFGC notes that the safety assessment of soybean line DAS-81419-2 conducted by Food Standards Australia New Zealand (FSANZ) included consideration of the following key elements:

- a characterisation of the transferred genes, their origin, function and stability in the soybean genome
- the changes at the level of DNA and protein in the whole food
- detailed compositional analyses
- evaluation of intended and unintended changes
- the potential for the newly expressed proteins to be either allergenic or toxic in humans.

The FSANZ assessment of soybean line DAS-81419-2 was restricted to food safety and nutritional issues. FSANZ did not identify any potential public health and safety concerns with soybean line DAS-81419-2.

The NZFGC supports choice in the market place and for manufacturers. The NZFGC also notes that all safety assessment reports of GM products are independently peer reviewed. On this basis, NZFGC therefore supports the approval of soybean line DAS-81419-2. This does not infer its use in New Zealand nor is this intended to influence the current process for environmental release of GM organisms in New Zealand which is an entirely separate process.