

10 February 2015

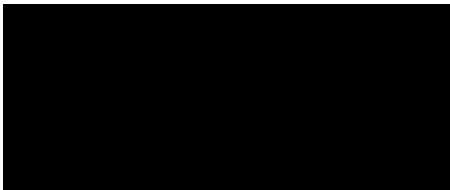
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for Submissions – Application A1097 Food derived from Herbicide-tolerant and insect-protected Corn Line MON87411.***

Yours sincerely



Katherine Rich  
**Chief Executive**

**Food Standards Australia New Zealand**  
**CALL FOR SUBMISSIONS – APPLICATION A1097 FOOD DERIVED**  
**FROM HERBICIDE-TOLERANT AND INSECT-PROTECTED CORN**  
**LINE MON 887411**  
**10 February 2015**

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to make a submission on the *Call for Submissions – Application A1097 Food derived from Herbicide-tolerant and insect-protected Corn Line MON87411*.

### **New Zealand Food & Grocery Council**

NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$28 billion in export revenue from exports to 185 countries – some 61% of total merchandise exports. 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. Our members directly or indirectly employ 370,000 people – one in five of the workforce.

### **Application A1097**

The NZFGC understands that the Corn line MON87411 is tolerant to the herbicide glyphosate and that tolerance is achieved through expression of the protein CP4 EPSPS and the protein Cry3Bb1. Mon87411 is also insect protected by expressing 240 bp dsRNA which, when taken up by the cells of the target insect, leads to the insect’s death.

### **Comments**

FSANZ has previously assessed the expression of both proteins CP4 EPSPS and Cry3Bb1 and has found these to be as safe as conventional foods. FSANZ notes that updated bioinformatics studies provided with the application confirm the absence of any significant amino acid sequence similarity to known protein toxins or allergens.

In relation to the insect resistance, again FSANZ has assessed several corn lines that approach insect protection in the same or similar way both singularly and in tandem with herbicide tolerance traits. The Australia New Zealand Food Standards Code contains the references to these previously approved herbicide-tolerant and insect-protected corn lines (in Standard 1.5.2).

The safety assessment of corn line MON87411 conducted by Food Standards Australia New Zealand (FSANZ) included consideration of the following key elements:

- an analysis of the molecular characterisation of the genetic material introduced into the host canola genome including the method used in the genetic modification and the function and regulation of the introduced genes
- the characterisation of the novel proteins including the function, phenotypic effects and the potential toxicity and allergenicity of the proteins

- detailed compositional analyses
- evaluation of intended and unintended changes.

NZFGC supports choice in the market place and for manufacturers. NZFGC also notes that all safety assessment reports of GM products are independently peer reviewed. On this basis, NZFGC therefore supports the approval of MON87411. 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.