

28 October 2015

Project Manager
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6143
NEW ZEALAND

Email: standards.management@foodstandards.gov.au

Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for submissions – Application A1114 - Food derived from High Yield Corn Line MON87403.***

Yours sincerely

pp Katherine Rich
Chief Executive

Food Standards Australia New Zealand
CALL FOR SUBMISSIONS – APPLICATION P1114: *FOOD DERIVED*
FROM HIGH YIELD CORN LINE MON87403

28 October 2015

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to comment on the ***Call for submissions – Application A1114 - Food derived from High Yield Corn Line MON87403***

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 A1114

The NZFGC understands that the high yield corn line MON87403 has been modified to have increased ear biomass (weight) at an early reproductive phase compared to conventional corn. This modification is achieved through a gene (*AtHB17*) from Arabidopsis being inserted to corn through an *Agrobacterium*-mediated transformation to confer the desired trait. Multiple years of field testing exhibited that the GE corn produced more yield than the control at majority of locations tested. The genetic modification is therefore designed to increase production.

Comments

FSANZ advises that MON87403 is intended primarily for use as a broad-acre commodity and is a dent corn. The grain from dent corns is mostly processed into refined products such as corn syrup and corn starch which, because of processing, are unlikely to contain any novel protein or novel DNA. Similarly, in the production process for refined corn oil, novel protein and novel DNA are not likely to be present. Therefore such products derived from line MON87403 would be unlikely to require labelling.

MON87403 products such as meal (used in bread and polenta) and grits (used in cereals) would be likely to contain novel protein or novel DNA, and if so, would require labelling. Sweet corn kernels containing the MON-87403-1 event are also likely to require labelling.

The safety assessment of soybean line MON87403 conducted by FSANZ included consideration of the following key elements:

- history of use
- the characterisation of newly expressed proteins including the stability of the genetic changes and the potential toxicity and allergenicity of the proteins
- detailed compositional analyses
- evaluation of intended and unintended changes.

FSANZ noted that bioinformatic studies confirmed the lack of any significant amino acid sequence similarity to known protein toxins or allergens and that digestibility studies demonstrated ATHB17 would be rapidly and completely digested in the gastrointestinal tract. The protein also loses DNA-binding activity with heating. Taken together, the evidence indicates the ATHB17 protein is unlikely to be toxic or allergenic to humans.

Detailed compositional analyses were done to establish the nutritional adequacy of grain from MON87403 and to characterise any unintended compositional changes. Analyses were done of 52 analytes and none deviated in level from the control in a statistically significant manner. FSANZ concluded that grain from line MON87403 is compositionally equivalent to grain from conventional corn varieties.

NZFGC supports choice in the market place and for manufacturers. NZFGC notes that Monsanto is simultaneously requesting approval for MON87403 as a food from Canada, Korea, Japan, Taiwan and the European Food Safety Authority having received authorisation for it as a food from the US Food and Drug Administration on 19 June 2015.

NZFGC notes that all safety assessment reports of GM products prepared by FSANZ are independently reviewed. On this basis, NZFGC supports the approval of MON87403. This does not infer its use in New Zealand nor is this intended to influence any process for environmental release of GM organisms in New Zealand which is an entirely separate process.