Comments from the Victorian Departments of Health and Human Services and Economic Development, Jobs, Transport and Resources

Submission due: 7 December 2017

The Victorian Departments of Health and Human Services and Economic Development, Jobs, Transport and Resources (the departments) welcome the opportunity to provide comments on Application A1147 – Food derived from herbicide-tolerant cotton line GHB811 (the Application).

The Application seeks permission for the sale and use of food derived from the herbicide-tolerant cotton line GHB811 which has been genetically modified (GM) to provide tolerance to the herbicides glyphosate and isoxaflutole. The departments understand that:

- The Applicant intends to commercially cultivate the crop predominantly in the USA and Brazil. There is currently no intention to apply for permission to cultivate the crop in Australia or New Zealand.
- Cotton line GHB811, double-herbicide tolerant, is developed to provide growers with new options for weed control.
- GHB811 is an *Agrobacterium*-mediated transformant line, where transformation was achieved using the vector pTSIH09 containing *hppdPfW336-1Pa* and *2mepsps* expression cassettes.
- The major foods derived from cotton are highly refined cottonseed oil and linters (essentially pure cellulose fibres) which, as they would be unlikely to contain any novel protein or DNA, would not require GM labelling.
- The approval of Application A1147 would permit food derived from this GM cotton to enter the Australian and New Zealand markets.

In addition, the departments note the following:

- FSANZ has previously approved a similar application for herbicide-tolerant cotton line DAS-81910-7 (Application A1094). DAS-81910 was transformed using same *Agrobacterium*-mediated transformation procedure.
- The application provides appropriate information regarding the genetic modification of the cotton line, including a detailed description of insertion of the pTSIH09 plasmid at a single locus of the cotton GHB811 genome, inheritance and stability of the insert across multiple generations.
- Bioinformatics analysis demonstrated the absence of any evidence to support cryptic gene expression or unintended effects resulting from the genetic modification.
- Food safety assessment of the 2mEPSPS and HPPD W336 proteins showed that the newly introduced proteins did not display health-related adverse effects.

Overall, no toxicity, allergenicity or nutrient composition concerns were raised by FSANZ in its safety assessment of this Application.

On this basis, the departments support the progression of Application A1147.