7 August 2018

Project Manager
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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 A1156: Food derived from super high oleic safflower lines 26 and 40.***

Yours sincerely

[redacted]
Chief Executive

[redacted]

Call for submissions – Application A1156: Food derived from super high oleic safflower lines 26 and 40

Submission by the New Zealand Food & Grocery Council

7 August 2018

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council ("NZFGC") welcomes the opportunity to comment on the ***Call for submissions – Application A1156: Food derived from super high oleic safflower lines 26 and 40.***

2. 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 $31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

THE APPLICATION

3. GO Resources Pty Ltd, an Australian technology business, has made application for amendment to Schedule 26 of the Australian New Zealand Food Standards Code (the Food Standards Code) to include two genetically modified super high oleic safflower lines 26 and 40. The lines produce very high levels of oleic acid and comparatively lower levels of linoleic acid in the seed.

OVERARCHING COMMENTS

4. NZFGC supports amendment to Schedule 26 of the Australian New Zealand Food Standards Code (the Food Standards Code) to include two genetically modified super high oleic safflower lines 26 and 40. It is particularly pleasing to see the development coming from a regional technology business, as research and development is vital to economic growth in the food sector.

5. We note the safety assessment found no public health or safety concerns but that any use in the food supply of the oil produced from the modified safflower seeds will require labelling as 'genetically modified'. This would not be on the basis of the presence of novel DNA or novel protein but on the basis of altered composition and nutritional profile.

DETAILED COMMENTS

6. GO Resources intends the main use of the modified safflower will be to produce oil for applications in the lubricant, fine chemical, bioplastics, pharmaceutical and cosmeceutical as well as food and personal care industries.

7. Cultivated safflower has been used by man for several thousand years. There are two types of oil from the seeds – one high in monounsaturated fatty acid oleic acid and the other high in polyunsaturated fatty acid linoleic acid. Both are used in the food industry.

Dietary intake assessment

8. Using available food consumption data from New Zealand and Australia, FSANZ concluded there were no identified target or at-risk groups across the populations. The modelling conducted by FSANZ showed increases of 8-14% of oleic acid were within normal daily variation of intakes. Intake estimates applied were intentionally highly protective of consumers (conservative) in order to make a determination about whether

there was a public health or safety concern associated with the altered nutritional profile of the safflower oil.

9. FSANZ concluded there was no nutritional concern to New Zealand or Australian populations from consuming the modified safflower.

Safety assessment

10. The safety assessment of food derived from the modified safflower lines addressed several criteria including a characterisation of the transferred gene sequences, their origin, function and stability, changes at the level of DNA, RNA and protein in the whole food, compositional analysis and an evaluation of the intended and unintended changes.

11. The safety assessment concluded there were no identified public health or safety concerns.

Labelling

12. Since the whole seeds and meal from the modified safflower contain novel DNA and protein, this factor alone would warrant the use of the seeds as foods to be labelled as genetically modified. However, the expectation is that these are unlikely to consumed at least in western diets.

13. It is the oil that could be used in foods and, as a result of the refining process used to extract the oil from the seed, novel DNA or novel protein are unlikely to remain in the refined oil. However, this does not address the changed nutritional profile of the oil that is characterised by high levels of oleic acid and reduced levels of linoleic acid compared to safflower oil from non-modified safflower seeds. This feature of the oil product will warrant the product and products made using the oil as an ingredient, to be labelled as 'genetically modified'.

14. FSANZ did consider the prospect of the need for labelling additional to the genetic modification requirement that might alert consumers to the changed characteristics of the safflower oil derived from the modified seeds. FSANZ concluded, however, that while consumers understood terms such as 'monounsaturated' and 'saturated', they would not appreciate differences between individual fatty acids.

15. FSANZ concluded that such labelling would be more likely to be confusing rather than helpful and, on this basis, determined additional labelling was neither necessary nor appropriate.

16. NZFGC considers the inclusion of this modified safflower oil in the range of oils available to New Zealand manufacturers presents opportunities for new products that can utilise the changed oleic acid profile for consumer food products. We therefore support amendment of the Food Standards Code to include genetically modified safflower.