

# Australian Food and Grocery Council SUBMISSION

SEPTEMBER 2012

**TO:**

FOOD STANDARDS AUSTRALIA NEW ZEALAND

**IN RESPONSE TO:**

A1071 - HERBICIDE-TOLERANT CANOLA LINE MON88302

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

With an annual turnover of \$108 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector<sup>1</sup> is Australia's largest and most important manufacturing industry. Representing 26 per cent of total manufacturing turnover, the sector the second largest industry behind the Australian mining sector and accounts for over one quarter of the total manufacturing industry in Australia.

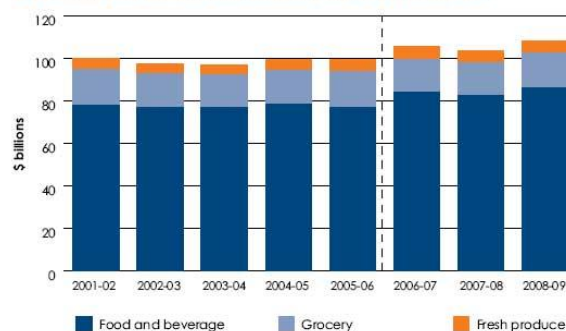
The growing and sustainable industry is made up of over 30,100 businesses and accounts for \$46 billion of the nation's international trade. The industry spends \$368 million a year on research and development.

The food and grocery manufacturing sector employs more than 312,000 Australians, representing about 3 per cent of all employed people in Australia, paying around \$13 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia<sup>2</sup>. It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

Figure 4.1: Composition of the industry's turnover (\$2008-09)



Source: ABS, catalogue number 8221.0 and 8159.0

<sup>1</sup> Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc.

<sup>2</sup> About Australia: [www.dfat.gov.au](http://www.dfat.gov.au)

## 1. INTRODUCTION

AFGC welcomes the opportunity to make this submission to Food Standards Australia New Zealand (FSANZ) in response to the assessment report for Application A1071 - Food derived from Herbicide-tolerant Canola Line MON88302.

AFGC notes the intent of this application is to amend Standard 1.5.2 – Food produced using Gene Technology, in the Australia New Zealand Food Standards Code (the Code), to permit the sale and use of food derived from genetically modified (GM) canola line MON88302, conferring tolerance to glyphosate.

This submission is in two parts:

1. Overall position and recommendation; and
2. Specific comment on matters in the assessment report.

## 2. AFGC POSITION

The AFGC **supports** this application on the basis that there is no identified risk to public health and safety and that FSANZ has established that food derived from canola line MON88302 is considered to be as safe for human consumption as food derived from conventional canola cultivars.

AFGC **supports** the current requirements for labelling GM foods when novel DNA or novel protein is present.

AFGC acknowledges that, having established that a GM food is safe and approved for use; it is up to companies and individuals to make their own independent commercial decision as to whether or not to use this product and label the product accordingly.

### AFGC Recommendation - Support Option 2:

**Preparation of a draft variation to Standard 1.5.2 to include food derived from canola line MON88305.**

## 3. SPECIFIC COMMENTS

### 3.1. The Application

AFGC notes that the assessment report has considered the genetic modification used in this plant, the potential toxicity and allergenicity of the novel protein, and the comparison of the genetically modified plant with that of a conventional plant.

FSANZ did not identify any public health and safety concerns, and concluded that food derived from canola line MON88302 is as safe and wholesome as the equivalent commercial counterpart, and there were no compositional differences of biological significance compared to conventional (non-GM) canola cultivars.

### 3.2. Consumer information

AFGC considers the current regulatory arrangements for foods derived from gene technology ("GM Foods"; Australian New Zealand Food Standards Code *Standard 1.5.2 Foods Produced using Gene Technology*) are appropriate to **ensure protection of public health and safety** and adequate information to consumers for informed choice.

The labelling of GM food is not a safety issue. It is solely related to the nature, extent and practicalities of providing information for informed consumer choice.

Current labelling regulations require food to be labelled when it contains genetically modified (GM) material or when the food is materially modified through the use of gene technology. The regulations also recognise the need for flexibility through exemptions and thresholds, in a way which does not undermine the effectiveness of providing for informed consumer choice.

These provisions are necessary as the food supply chain cannot guarantee absolute segregation of ingredients all the time resulting in occasional trace (i.e. less than 1%) accidental presence of GM material. The provisions also recognise that if a company determines not to use GM ingredients and has production processes which deliver non-GM foods, the occasional accidental presence of GM material should not render the company non-compliant with food labelling regulations.

The AFGC Product Information Form (PIF)<sup>3</sup> may be of assistance to companies in identifying GM ingredients, and components of ingredients, and to ensure compliance with labelling requirements.

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<sup>3</sup> <http://www.afgc.org.au/tools-guides-/product-info-form.html>

# Australian Food and Grocery Council

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- Beak and Johnston Pty Ltd
- Beechworth Honey Pty Ltd
- Beerenberg Pty Ltd
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- Birch and Waite Foods Pty Ltd
- Body Science International Pty Ltd
- Bronte Industries Pty Ltd
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- Bundaberg Brewed Drinks Pty Ltd
- Bundaberg Sugar Ltd
- Byford Flour Mills/Millers Foods
- Byron Food Science
- Campbell's Soup Australia
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- Cheetham Salt Limited
- Christie Tea Pty Ltd
- Church & Dwight (Australia) Pty Ltd
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- Coca-Cola Amatil Ltd
- Coca-Cola South Pacific Pty Ltd
- Colgate-Palmolive Pty Ltd
- Coopers Brewery Ltd
- D.E Coffee & Tea Retail Australia/Sara Lee Coffee & Tea Retail Australia
- Danisco Australia Pty Ltd
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- DSM Food Specialties Australia Pty Ltd
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- Earlee Products Pty Ltd
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- Fibrisol Service Australia Pty Ltd
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- Food Spectrum Group
- FPM Cereal Milling Systems Pty Ltd
- Freedom Foods Group
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- GlaxoSmithKline Consumer Healthcare
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- Goodman Fielder Limited
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- Healthy Snacks Australia Pty Ltd
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- Igea Group
- Jalna Dairy Foods Pty Ltd
- JBS Australia Pty Limited
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- Kimberly-Clark Australia Pty Ltd

- Kitchens of Sara Lee
- Kraft Foods Limited
- Laucke Flour Mills Pty Ltd
- Lindt & Sprungli Australia
- Lion Dairy and Drinks Pty Ltd
- Madura Tea Estates
- Manildra Harwood Sugars
- Mars Chocolate
- McCain Foods (Aust) Pty Ltd
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- McDonald's Australia Ltd
- Merisant Australia Pty Ltd
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- Nerada Tea Pty Ltd
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- Nutricia Australia Pty Ltd
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- Tetra Pak Marketing Pty Ltd
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- CropLife Australia Limited
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- Food Industry Association Qld Inc
- Food Q Inc
- Foodservice Suppliers Association of Australia
- Grains & Legumes Nutrition Council
- Private Label Manufacturers Association Australia/New Zealand