

26 August 2015

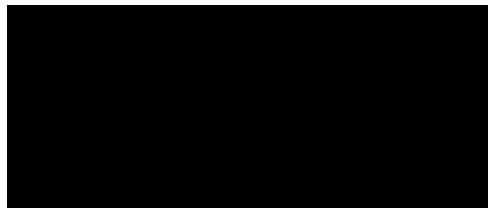
Manager
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Food Standards Australia New Zealand
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for Submissions – Application A1100 Food derived from Insect-protected Soybean Line MON87751.***

Yours sincerely



Katherine Rich
Chief Executive

Food Standards Australia New Zealand
CALL FOR SUBMISSIONS – APPLICATION A1110 FOOD DERIVED
FROM INSECT-PROTECTED SOYBEAN LINE MON 87751

26 August 2015

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to make a submission on the *Call for Submissions – Application A1110 Food derived from Insect-protected Soybean Line MON87751*.

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 A1110

The NZFGC understands that the Soybean line MON87751 is insect protected against lepidopteran pests of soybean. Protection against lepidopteran insect pests is achieved through expression of two Cry proteins (Cry1A.105 and Cry2Ab2) encoded by genes derived from the common soil bacterium *Bacillus thuringiensis*.

Comments

Food Standards Australia New Zealand (FSANZ) has previously assessed the safety of the Cry1A.105 and Cry2Ab2 proteins and has found these to be as safe as conventional foods.

FSANZ advises that MON87751 is intended primarily for use as a broad-acre commodity (field soybean) to produce products derived from cracked soybeans. Such products are generally refined oils. MON87751 is not intended for vegetable or garden purposes where food-grade products may include tofu, soybean sprouts, soy milk, and green soybean (e.g. edamame). Processing of field soybean for oil means novel protein and novel DNA are not likely to be present in the oil.

The safety assessment of soybean line MON87751 conducted by FSANZ included consideration of the following key elements:

- the characterisation of the novel proteins including the function, phenotypic effects and the potential toxicity and allergenicity of the proteins
- an analysis of the transferred gene sequences, their origin, function and stability in the soybean genome
- the changes at the level of DNA and protein in the whole food
- detailed compositional analyses
- evaluation of intended and unintended changes.

NZFGC supports choice in the market place and for manufacturers. NZFGC notes that Monsanto requested and received a Determination of Nonregulated Status for MON 87751 from the USDA (delivered on 17 October 2014). Monsanto also submitted MON 87751 to the US Food and Drug Administration (FDA). The Canadian Food Inspection Agency and Health Canada authorised MON 87751 on 31 October 2014. Applications by Monsanto are under assessment in Korea, Japan, People's Republic of China, Taiwan, Brazil, Argentina and the European Food Safety Authority.

NZFGC notes that all safety assessment reports of GM products prepared by FSANZ are independently peer reviewed. On this basis, NZFGC supports the approval of MON87751. 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.