

FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA INC

P O Box 4107, Frankston Heights, VIC 3199

Phone/Fax 03 5971 5817

email fta@ftaus.com.au

TO

NBTConsultSubmissions@foodstandards.gov.au

FSANZ

RE FOOD DERIVED USING NEW BREEDING TECHNIQUES

We take pleasure in forwarding Comments from the FTAA Technical Committee in response to your request to responses for the following questions on NBT.

Best Regards

Peter Bush

Executive officer

FTAA

Tel 041 958 6723

3.1.1 Questions

Do you agree, as a general principle, that food derived from organisms containing new pieces of DNA should be captured for pre-market safety assessment and approval?

Should there be any exceptions to this general principle?

Yes – There should be no exemptions. food additives and process aids that have been in use for hundreds of years and shown to be safe repeatedly are still continually reassessed – this should be no different for GM food – all GM food

3.1.2 Questions

Should food from null segregant organisms be excluded from pre-assessment and approval?

If yes, should that exclusion be conditional on specific criteria and what should those criteria be?

If no, what are your specific safety concerns for food derived from null segregants?

There are no specific safety concerns as discussed currently for food derived from null segregants, but then the issue is that the changes may cause issues further down the track. By classifying these as non GMO, the product derived from these will not need labelling. There is evidence that consumers want to know what changes their food has undergone. By not requiring labelling the food chain becomes less transparent increasing the distrust consumers have of agriculture and food processing

3.1.3 Questions

Are foods from genome edited organisms likely to be the same in terms of risk to foods derived using chemical or radiation mutagenesis? If no, how are they different?

There is no understanding of the changes that can occur over generations in these gene edited products in the wild. It has been suggested that gene edited organisms may not be stable in the wild (non laboratory conditions) and can change. Nor are we sure what the effect of ingesting these products will be on humans. Especially if these changes are not stable, they may effect the way they are digested.

Reference: <https://www.quantamagazine.org/new-model-warns-about-crispr-gene-drives-in-the-wild-20171116/>

If yes, would this apply to all derived food products or are there likely to be some foods that carry a greater risk and therefore warrant pre-market safety assessment and approval?

Assume the risk would be the same across all foods.

3.2 Questions

Are you aware of other techniques not currently addressed by this paper which have the potential to be used in the future for the development of food products?

Should food derived from other techniques, such as DNA methylation, be subject to pre-market safety assessment and approval?

All food should be subject to pre market safety assessment and approval. This can lead to more transparency and increase consumer confidence in the food chain. There is already a great distrust amongst some consumer about the production and safety of food – both the agricultural side and food processing industries.

3.3 Questions

Do you think a process-based definition is appropriate as a trigger for pre-market approval in the case of NBTs? If no, what other approaches could be used?

If yes, how could a process-based approach be applied to NBTs?

Are there any aspects of the current definitions that should be retained or remain applicable?

All processes should trigger pre market approval as all will be ingested by and there is a need to prove the food is safe.

3.4 Question

Are there other issues not mentioned in this paper, that FSANZ should also consider, either as part of this Review or any subsequent Proposal to amend the Code?

The areas not covered in this review is how the changed products will be able to be traced back through the food chain and labelling. There is a proportion of consumers who want the ability to choose how the food they eat is produced. Rational or not they do not want food produced with accelerated breeding techniques where the DNA has been changed in the laboratory. These people do need to be accommodated and this may be addressed by labelling, but then there must be a robust trace back and labelling regime in place. This will help to increase trust in the food supply.

