



Submission to the Community Affairs Legislation Committee

Inquiry into the

Food Standards Amendment (Truth in Labelling-Genetically Modified Material) Bill 2010

Michael Gilbert, 18th January 2011

Introduction

Consumer choice is an important consideration in providing food in a modern society. It is important that consumers understand where food comes from and the processes used in its production. We support a “whole of value chain” approach to food knowledge and safety and for this reason ACPFG fully supports accurate food labelling.

However, we regard the *Food Standards Amendment (Truth in Labelling-Genetically Modified Material) Bill 2010* as discriminatory toward but one of many processes used to produce food.

We are concerned that the proposed amendment focuses on a production process rather than what has actually been modified in the product. The proposed amendment does not require that the type of gene introduced be identified, nor the impact of that gene, be it a human health characteristic, production trait and so on.

We argue that the proposed amendment “singles out” one technique used in food production without considering that there are many other processes that do not require labelling but probably should.

GM adoption

The adoption of GM crops world-wide has continued to increase at around 12% each year. In 2009 there were 134 million ha of GM crops grown worldwide or over double the area sown in 2000 (<http://www.isaaa.org/>). Most of the rest of the world has shown overwhelming support for GM crops. GM crops are now used, without incident, by 14 million farmers in 25 countries around the world. In North America the proportion of the soybean crop that is GM has risen to over 90%, the maize crop is 75% GM and canola is 70% GM. The GM technology has also been widely adopted in developing countries in Asia and Africa, where pest tolerant crops are greatly improving the security of food supply and hence political security. The most rapid increase over the past few years has been in India and China. Even Europe, where the main opposition to GM crops originated, GM crops are now grown in Germany, France, Spain, Portugal, Czech Republic and Slovakia.

Process

Genetic Modification, an extension of traditional plant breeding, is a process used to enhance production or product characteristics in a clean, scientific manner. It is only carried out by accredited organisations that are subject to a variety of legislative instruments.

Australia has an extensive safety regime for GM products; in particular the regulatory system operated by the Office of the Gene Technology regulator oversees many processes related to research and the production of GM products. The OGTR has now issued 12 licenses for the commercial production of GMOs and around 100 licenses for intentional release.

The previous regulatory body (GMAC) issued over 150 licenses.

GM technology underpins most aspects of modern biological research. There are over 1,500 approved facilities for work on GMOs in Australia in over 400 research organisations and there are several thousand research projects that have been registered (<http://www.ogtr.gov.au/>). Therefore, this is clearly an area of enormous activity. The Australian regulatory system is well regarded internationally and is generally viewed as amongst the most stringent in the world.

In addition, all foods produced where GM techniques have been used are subject to accreditation by Food Safety Australia New Zealand. The process for “de-regulating” such products is extensive and expensive.

Testing

Products that arise from GM techniques are the subject of extensive analysis and testing. We argue that the testing threshold is indeed significantly higher than that applied to many foods. Many other processes, such as those used in organic farming, are not the subject to the same rigorous testing.

Value Chain

We support the education of consumers regarding food production. However GM is but one technology of many used to produce food. Proposals to improve food labelling should consider all processes used in the production of food.

The proposed amendment does not consider the myriad of other processes used to produce food. For example, it does not consider the possibility that consumers may wish to know what agricultural practices were used in the production of food. For example, it is well known that organic fertilizers can, if improperly used, potentially result in bacterial infection, yet there is no requirement to warn consumers of this. Nor are consumers advised in many cases that “organically produced” food may indeed have been made using many inorganic products including toxic heavy metals and complex mixtures of untested chemicals.

We recommend that the Committee consider all technologies involved in food manufacture rather than focussing on just one process.

The proposed amendment also does not consider labelling for freshness. Whilst this is a basic requirement of healthy food, and many products have a “Use-by” date, consumers may wish to know how much time elapses from “paddock to plate”.

Disincentive

The proposed amendment discriminates against one particular process; it is likely that an unintended consequence of such changes, if introduced, will be to create a disincentive for food producers to use new technologies. In the past, radical new processes have been introduced without a requirement to label; examples include the salting of food, pickling, ultra-high-temperature treatments and gamma irradiation.

As the world population continues to increase, we will need to become more innovative in our approaches to food production, not less innovative.



There is a risk that the cost competitiveness of Australian producers will be reduced if labelling requirements are onerous.

Consumer messages

We argue that such an amendment will send message to consumers that somehow GM processes are worse than other processes by singling out GM for labelling. There is no scientific evidence of this and indeed the evidence points to the opposite being true.

Identity preservation

Some GM crops, such as GM canola, are “substantially equivalent” in characteristics to their traditional counterparts. If identity preservation is required, purely due to labelling requirements, this will mean that production costs will increase. This may reduce the incentive for growers to adopt new technologies.

We therefore agree, as proposed in the amendment, that the onus should be on producers, manufacturers and distributors claiming GM-free status, and labelling accordingly, to ensure that such food is indeed segregated from GM food.

Conclusion

We urge the Committee to carefully consider the implications of the proposed amendment and recommend that it takes a more comprehensive approach to food safety and labelling.

