

Senate Community Affairs Committee  
Inquiry into the Food Standards Amendment (truth in labelling-genetically modified  
material) Bill 2010

Tasmanian Department of Primary Industries, Parks, Water and Environment  
Submission

The Department of Primary Industries, Parks, Water and Environment (DPIPWE) supports consumer choice through adequate and truthful food labelling for a range of matters, including presence of genetically modified material. As the Tasmanian Government has suggested to the current National Review of Food Labelling Law and Policy, the 1% threshold for GM contamination in the Food Standards Code is generous and may not sufficiently provide for a level of informed choice commensurate with current community expectations. It is therefore worthwhile exploring alternative approaches to food labelling in regard to GM material, such as put forward in the proposed Bill.

The Bill proposes a two-part labelling scheme – i.e. food is labelled as either containing GM material, irrespective of origin or intent, or GMO-free, contingent upon due diligence. The conceptual simplicity of this scheme is appealing from a consumer perspective. However, costs of compliance, particularly in terms of GM testing and enforcement may be prohibitive.

There could be ways of reducing these costs, albeit that these have other limitations. For example, a three-part labelling scheme comprising 'contains GM material', 'may contain GM material' and 'GMO-free' would allow food producers or manufacturers who make no GMO-free claims but whose products may be affected by GM contamination to avoid the need to test. Under the two-part scheme in the proposed Bill such manufacturers would need to test. Of course, a statement about what a food may contain does not reveal what a food does contain and is limited in this regard. Nonetheless, it is truthful and offers some basis for consumer choice.

The other matter that applies to any labelling scheme that provides for 'GMO-free', concerns testing precision and cost. Highly sensitive tests exist that can service GMO-free policy settings. For example, the Tasmanian Government, in administering its GMO-free policy for primary industries, requires that all imported canola seed is subject to a DNA test capable of detecting 1 GM seed in 10,000 non-GM seeds, 95 times out of 100. That is, we accept a negative result from a test capable of detecting 0.01% GM contamination as sufficient evidence of zero GM content in canola seed. To our knowledge, this is the most stringent GM test requirement for seed in the world. Government supports it because the value to our Brand of remaining GMO-free is likely to exceed costs to the community of this testing regime. Similarly, the level of testing to support GMO-free food labelling would need consideration against compliance costs and be practically enforceable.