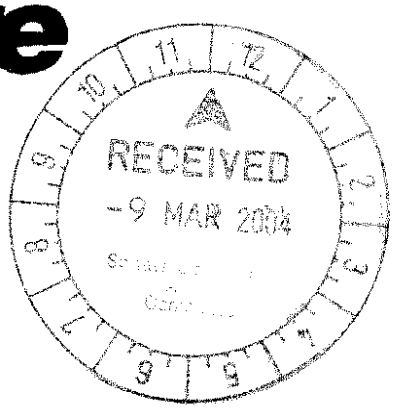
Avcare



9 March 2004

Senator Knowles
Chair
Community Affairs Legislation Committee
The Senate
Parliament House
CANBERRA ACT 2600

FACSIMILE: 02 6277 5829

Dear Senator Knowles

The following information addresses a number of issues raised by Greenpeace in their evidence presented to the Committee on 4 March 2004.

Current labelling requirements for GM
Standard 1.5.2 of the Food Standards Code prescribes the labelling of genetically modified food where:

- novel DNA and/or protein is present in the final food; and
- where the food has altered characteristics;

The following are exempt from these requirements:

- highly refined food where the effect of the refining process is to remove novel DNA and/or protein;
- processing aids and food additives except those where novel DNA and/or protein is present in the final food;
- flavours which are present in a concentration less than or equal to 0. 1% in the final food; and
- food prepared at the point of sale.

Also exempt from GM labelling are ingredients where they contain up to 1% of genetically modified material where its presence is unintended. This threshold has been set based on FSANZ review of international literature in relation to health, safety and monitoring.

Labelling regulations for oil
A study published in the *New England Journal of Medicine* was cited by Mr Hepburn. A review of the findings of this study was published in *Journal Watch Dermatology*, a summary copy of which is attached. This review concludes that insufficient information was provided about the purification process to extrapolate from peanut oil to highly processed food oils such as canola. Note also that the peanut oil was derived from conventionally bred and grown peanuts.

It is important to note that the Office of the Gene Technology Regulator (OGTR) and Food Standards Australia New Zealand (FSANZ) assess the allergenicity and toxicity of food products derived from GM modified organisms. The currently approved GM crops/food products have been assessed by both the OGTR and FSANZ as posing negligible risks from allergenicity or toxicity.

Therefore, there is no reason to make an association between oil derived from peanuts which are known to contain allergenic proteins and oil derived from GM canola or cotton which have been assessed otherwise.

National Association for Crop Production and Animal Health

Avcare Limited ABN 29 008 579 048
Level 2 AMP Building 1 Hobart Place Canberra ACT 2601
Locked Bag 916 Canberra ACT 2601
Telephone: 02 6230 6399 Facsimile: 02 6230 6355
Email: avcare@avcare.org.au
Internet address: www.avcare.org.au

Since December 2002, under the FSANZ food labelling rules all food (regardless of whether sourced from GMOs or conventional) must make label declarations of the presence of potential allergens in foods, however small the amount.

Substantial Equivalence

As indicated in Avcare's evidence, substantial equivalence is an accepted scientific concept and forms a key component of the internationally established scientific principles of food safety assessments. The OECD report (OECD 2000, "Report of the task force for the safety of novel foods and feeds") states that the risks associated with biotechnology-derived foods are not inherently different from the risks associated with conventional ones, however, novel foods and foods products should be [demonstrably] as safe for the consumer as the conventional product.

The OECD concludes that safety assessments based on substantial equivalence is the most practical approach to assess the safety of foods and food components and the FAO/WHO have endorsed this approach (FAO/WHO 1996, "Joint consultation report, Biotechnology and Food Safety. FAO Food and Nutrition Paper 61."

Note also that substantial equivalence is part of the complete food safety assessment of foods derived from biotechnology which also includes complete characterisation of the host, the new gene(s), the novel protein(s) and determination of the potential for the novel proteins to be toxic or allergenic.

Review of scientific studies that underpin applications to FSANZ

The scientific credibility and independence of the experimental work and reports provided by the Research and Development Companies to the Food Safety Agencies is questioned by those opposed to the technology. This insinuation is unfounded. FSANZ employ specialists who review in detail the materials and methods, raw data and conclusions for each of the studies submitted by the technology providers. During the assessment period, which is often over 1 year or more, FSANZ frequently seek clarification and further explanation and sometimes request further experiments before their final recommendation is made to Ministers. They also confer with their counterparts in other agencies both internally and in other jurisdictions (e.g. Health Canada).

This process is as rigorous as that conducted during the peer-review process required for publication in scientific journals and firmly establishes the credibility of the data generated by the proponents.

Changes to glyphosate residue thresholds

Maximum Residue Levels (MRLs) are established by measuring the pesticide residue in the commodity after the pesticide is used according to good agricultural practice. If a use pattern is modified the residue profile may also change and the APVMA may agree to recommend to FSANZ an alteration to the MRL. This does not imply that the risk to consumers is increased since the total acceptable daily intake (ADI) is determined by a whole of diet assessment based on highly conservative studies and models.

Please do not hesitate to contact me if you would like any further information.

Yours sincerely,

Claude Gauchat
Executive Director