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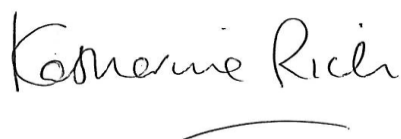
Dear Sir/Madam

The New Zealand Food & Grocery Council comments ***Consultation paper – Food derived using new breeding techniques*** are as follows.

NZFGC does not consider the new breeding techniques require separate and ongoing risk assessment. Where no new DNA is introduced even if the genome is changed then the risk to the consumer is low. Applying a risk-based approach to the food regulatory system, low risk activities should not attract regulator intervention. However, we commend FSANZ for establishing an Expert Advisory Group on New Breeding Techniques as an interim measure to advise on and monitor developments.

The reason for our position is that even though the genome might have new DNA initially, new DNA is not included in the final product. Rootstock grafting is an example of the new DNA being confined to the rootstock. It would also be important not to get ahead of the two other reviews underway by the Office of the Gene Technology Regulator.

Yours sincerely


Katherine Rich