



9 June 2020

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NEW ZEALAND

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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for Submissions Application A1196 Food derived from nematode-protected and herbicide-tolerant soybean line GMB151.***

Yours sincerely

A handwritten signature in dark ink that reads "Katherine Rich". The signature is written in a cursive style with a horizontal line underneath the name.

Katherine Rich  
**Chief Executive**



***Call for submissions: Application A1196  
Food derived from nematode-protected  
and herbicide-tolerant soybean line  
GMB151***

**Submission by the New Zealand Food & Grocery  
Council**

**9 June 2020**

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## NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the ***Call for Submissions: Application A1196 Food derived from nematode-protected and herbicide-tolerant soybean line GMB151.***
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

### BACKGROUND

3. BASF Australia Ltd has applied to vary FSANZ Standard 1.5.2 to allow the use of genetically modified (GM) soybean (Glycine max L. Merr.) derived from transformation event GMB151 in the Australian and New Zealand food industries. Five main food products are derived from soybean: whole soybeans, oil, meal, hulls and protein. Of these, soybean oil is the most consumed soybean product in Australia used in margarines, shortenings and cooking and salad oils. Other products include soy sprouts, milk, tofu, tempeh, miso, natto, and soy sauce. The different soy protein products are added to bakery products, snack foods, noodle products and comminuted meat products.
4. Soybean event GMB151 contains the stably integrated cry14Ab-1.b and hppdPf-4Pa gene cassettes. This is the first time that the Cry14Ab-1 protein has been assessed for food safety in Australia and New Zealand.

### COMMENTS

5. FSANZ conducted a safety assessment of the food derived from GMB151 including the characterisation of the introduced gene sequences, the biochemical, potential toxicity and allergenicity analyses of the novel proteins introduced through the genetic modification.
6. The safety assessment concluded that food derived from soybean line GMB151 was as safe for human consumption as food derived from conventional soybean cultivars.
7. If soybean from line GMB151 was used in soy flour or protein concentrates, novel protein or novel DNA would be present and the products would require labelling. Highly refined products like soybean oils would not require labelling because the refinement process removes novel proteins.
8. Applications have been made for approval in the EU (Oct 2018), USA (Jan 2020), Canada (May 2019) and Uruguay.
9. NZFGC supports the proposed amendment to Schedule 26 that would include a reference to food derived from soybean line GMB151 thereby permitting the use and sale of food from this soybean line in Australia and New Zealand.