



17 September 2020

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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 A1198: Food derived from enhanced yield & herbicide-tolerant corn line DP202216*.

Yours sincerely

Katherine Rich  
**Chief Executive**



***Call for Submissions – Application A1198:  
Food derived from enhanced yield &  
herbicide-tolerant corn line DP202216***

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

**17 September 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 A1198: Food derived from enhanced yield & herbicide-tolerant corn line DP202216*.
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.

### Application A1114

3. Corn line DP202216 from Dow AgroSciences Australia Pty Ltd has been modified to have increased yield and a tolerance to the herbicidal active ingredient glufosinate-ammonium.

### Comments

4. FSANZ advises that Corn line DP202216 is intended primarily for use as a milled starch for sweetening products, maize/corn oil and high fructose corn-syrup. This could mean use in dessert mixes, canned foods, breakfast cereals, baking products, corn chips and extruded confectionary. Because of processing, many of these products are unlikely to contain any novel protein or novel DNA. Similarly, in the production process for refined corn oil, novel protein and novel DNA are not likely to be present. Therefore such products derived from line DP202216 would be unlikely to require labelling.
5. If any corn line DP202216 was milled as meals (used in bread and polenta) and grits (used in cereals) they would be more likely to contain novel protein or novel DNA, and if so, would require labelling as ‘genetically modified’.
6. The safety assessment of corn line DP202216 conducted by FSANZ included consideration of the following standard key elements for GM foods:
  - history of use
  - the characterisation of newly expressed proteins including the stability of the genetic changes and the potential toxicity and allergenicity of the proteins
  - detailed compositional analyses
  - evaluation of intended and unintended changes.
7. The conclusion was that no potential public health or safety concerns were identified by this assessment.
8. In relation to risk management and labelling, refined products such as corn syrup and corn starch are unlikely to contain any novel protein or novel DNA, and would be unlikely to require labelling.
9. NZFGC supports choice in the market place and for manufacturers. We note that applications for corn line DP202216 are simultaneously being considered for approval in the USA and the EU.

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10. NZFGC supports the approval of corn line DP202216. This does not infer its use in New Zealand nor is this intended to influence any process for environmental release of GM organisms in New Zealand which is an entirely separate process.