



18 May 2023

Project Manager
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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 A1262 Food derived from insect-protected corn line MON95275*.

Yours sincerely

A handwritten signature in blue ink, appearing to be "Raewyn Bleakley".

Raewyn Bleakley
Chief Executive



**Call for submissions – Application A1262
Food derived from insect-protected corn
line MON95275**

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

18 May 2023

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the *Call for submissions – Application A1262 Food derived from insect-protected corn line MON95275*.
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.

THE APPLICATION

3. Bayer Crop Science (Australia) has applied for an amendment to Schedule 26 of the *Australia New Zealand Food Standards Code (the Food Standards Code)* to allow a food derived from insect-protected corn line MON95275 for use in food manufacture. The prospect is that food derived from corn line MON95275 may be imported in food products by Australia or New Zealand through the inclusion of, for example, corn meal.

COMMENTS

Assessment by FSANZ

4. **Safety assessment** – FSANZ assesses the identity and purity of all foods derived from genetic modification and has done so for corn 31 times. Seventeen of those corn lines have been assessed for insect protection. In this case, as in previous cases, FSANZ’s assessment covered the following elements:
 - a characterisation of the transferred genetic material, its origin, function and stability in the corn genome
 - characterisation of novel nucleic acids and protein in the whole food
 - detailed compositional analyses
 - evaluation of intended and unintended changes
 - assessment of the potential for any newly expressed protein to be either allergenic or toxic in humans.
5. FSANZ’s conclusion was that the corn line MON95275 presented no potential public health and safety concerns have been identified. It was safe for use in the manufacture of foods that might be imported into New Zealand or Australia.
6. NZFGC notes that in accordance with the labelling provisions in Standard 1.5.2, food for sale derived from a GM food such as corn line MON95275 will be required to be labelled as ‘genetically modified’ if, among other things, the GM food:
 - contains novel DNA or novel protein; or
 - is listed in subsection S26—3(2), 2(A) or (3) of Schedule 26 as being subject to the condition that the labelling must comply with section 1.5.2—4 of Standard 1.5.2 (such food has altered characteristics).
7. FSANZ has determined that food derived from corn line MON95275 does not have altered characteristics but even so, products derived from corn line MON95275 such as flour (used in bread), meal (used in polenta) and grits (used in cereals) would likely contain novel DNA or novel protein, and if so, would require labelling as ‘genetically modified’.

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8. NZFGC further understands that refined products from corn line MON95275 such as corn starch, corn oil and sweeteners are unlikely to contain any novel DNA or novel protein and would be unlikely to require labelling as 'genetically modified'.
 9. Application for approval of this corn line MON95275 has been made to the USA, Brazil, Canada, Japan, Taiwan, the EU, Philippines, Indonesia and Thailand.
 10. **NZFGC Conclusion** – On the basis of the foregoing, NZFGC supports the amendment to Schedule 26 of the Food Standards Code that would see corn line MON95275 added as a commodity to S26—3 with no conditions specifically attached to this corn line.