



6 November 2023

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Tēnā koe

Attached are the comments that the New Zealand Food and Grocery Council wishes to present on the *Call for submissions – Application A1274: Food derived from disease-resistant banana line QCAV-4*.

Ngā mihi nui

A handwritten signature in blue ink, appearing to be "Raewyn Bleakley". The signature is stylized and fluid, with a long horizontal stroke extending to the right.

Raewyn Bleakley
Chief Executive



**Call for submissions – Application A1274:
Food derived from disease-resistant
banana line QCAV-4**

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

6 November 2023

NEW ZEALAND FOOD AND GROCERY COUNCIL

1. The New Zealand Food and Grocery Council (**NZFGC**) welcomes the opportunity to comment on the *Call for submissions – Application A1274: Food derived from disease-resistant banana line QCAV-4*.
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. Queensland University of Technology (QUT) has applied to Food Standards Australia New Zealand (FSANZ) for a variation to Schedule 26 in the Australia New Zealand Food Standards Code (the Food Standards Code) for the sale and use of food derived from a new food produced using gene technology (GM food): banana line QCAV-4. Banana line QCAV-4 has been genetically modified to have resistance to the fungal disease Fusarium wilt tropical race 4 (TR4), also known as Panama disease.

COMMENTS

Assessment by FSANZ

4. FSANZ addressed safety and nutrition concerns in its risk assessment but not environmental release or risks to animals that may consumer the product as feed. The FSANZ assessment covered:
 - a characterisation of the transferred genetic material, its origin, function and stability in the banana
 - detailed compositional analyses of the banana flesh as well as some limited analyses of the peel.
5. In relation to characterisation, FSANZ has advised that updated bioinformatic analyses undertaken for Application A1274 confirmed that the expressed protein is unlikely to be toxic or allergenic to humans.
6. The compositional analyses did reveal some statistically significant differences in mean values for some constituents between QCAV-4 and the control but FSANZ assessed these differences as being generally within the range of natural variation for banana. Overall, FSANZ advised that the compositional data supported the conclusion that there were no biologically significant differences in the levels of key constituents in QCAV-4 compared to non-GM banana cultivars available on the market.
7. FSANZ concluded that there were no potential public health and safety concerns identified in the assessment of disease-resistant banana line QCAV-4. On the basis of the data provided in the application and other available information, food derived from QCAV-4 was considered to be as safe for human consumption as food derived from non-GM banana cultivars.

New Zealand market

8. QUT stated that Australia's banana industry mainly serves the domestic market, therefore fresh fruit derived from the GM banana was unlikely to be exported and sold in New

Zealand if approved to be cultivated in Australia. It went on to say that some processed products may be sold in New Zealand.

9. Bananas are the highest consumed fruit in both Australia and New Zealand. New Zealand does import bananas from Australia but at a very low level. The top trading partners for the import of "Bananas, including plantains, fresh or dried" category by New Zealand in 2022¹ is:
 - Ecuador with a share of 61% (US\$43m)
 - Philippines with a share of 22% (US\$16.1m)
 - Mexico with a share of 13.6% (US\$9.69m)
 - Panama - US\$663,000
 - Thailand - US\$229,000
 - India - US\$98,000
 - Australia - US\$95,000
 - Sri Lanka - US\$36,000
 - Tonga - US\$13,200
 - Fiji - US\$10,400.
10. Food and nutrition security remain relevant issues globally and global challenges for crop productivity that impact nutritional status and other health outcomes of populations are important to consider. Should the Panama disease decimate the Australian banana crop then a homegrown alternative would be available in the QCAV-4 cultivar.
11. Bananas are nutritious and a source of vitamin B6 (assists more than 100 enzymes to perform various functions, including the breakdown of proteins, carbohydrates, and fats; maintaining normal levels of homocysteine (since high levels can cause heart problems); and supporting immune function and brain health), fibre, potassium (one serving provides 450mg of potassium or around a tenth of recommended daily intake)², magnesium, vitamin C and manganese.
12. While Australian imports are small (around 0.5% of all banana imports by New Zealand), should the need arise, and for food security reasons, access to Australian bananas needs to be considered. As well, should the disease resistant breed be sold by Australia to other banana producing nations (noting the disease is called 'Panama disease') then New Zealand would be well placed to accept the same imports from other countries.
13. As a result, NZFGC supports the application for *bananas from the disease-resistant banana line QCAV-4* for food security, nutritional and sustainability reasons.

Labelling

14. NZFGC notes that FSANZ identified that while whole foods required labelling as GM, those same foods in a cut and packaged form did not. This was not the intention of the GM labelling provisions and FSANZ has proposed an amendment of Standard 1.2.1—9(3) so that information about GM food (including, if approved, whole or cut fresh bananas from banana line QCAV-4) would have to be provided in accordance with Standard 1.5.2—4 and for a GM food referred to in Standard 1.2.1—6(1)(c).
15. NZFGC supports the amendments to the labelling provisions as described above and reflected in the draft variation.

¹ [New Zealand | Imports and Exports | World | Bananas | Value \(US\\$\) and Value Growth, YoY \(%\) | 2011 - 2022 \(trendeconomy.com\)](#) published 14 May 2023

² [Bananas | The Nutrition Source | Harvard T.H. Chan School of Public Health](#)