



11 December 2023

Project Manager  
Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
Wellington 6143  
NEW ZEALAND

Email: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

Tēnā koe

Attached are the comments that the New Zealand Food and Grocery Council wishes to present on the *Call for submissions – Application A1276: Food derived from herbicide-tolerant soybean line MON94313*.

Ngā mihi nui

A handwritten signature in blue ink, appearing to be "Raewyn Bleakley". The signature is stylized and fluid.

Raewyn Bleakley  
**Chief Executive**



**Call for submissions – Application A1276:  
Food derived from herbicide-tolerant  
soybean line MON94313**

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

**July 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 A1276: Food derived from herbicide-tolerant soybean line MON94313*.
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 CropScience Proprietary Limited (**Bayer**) has applied to amend the Australia New Zealand Food Standards Code (**the Food Standards Code**) to permit the sale and use of food derived from a new food produced using gene technology: soybean line MON94313. This soybean line has been genetically modified for tolerance to the herbicides glufosinate, dicamba, 2,4-D, and mesotrione.

## COMMENTS

### **Assessment by FSANZ**

4. FSANZ addressed health and safety concerns in its risk assessment covering:
  - a characterisation of the transferred genetic material, its origin, function and stability in the soybean 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. The novel substances expressed by MON94313 has previously been assessed by FSANZ in all but one area, some in up to 30 other applications. The safety assessment of MON94313 found no potential public health and safety concerns. Based on the data provided by the applicant and other information, food derived from soybean line MON94313 was considered by FSANZ to be as safe for human consumption as food derived from conventional non-GM soybean varieties.
6. If approved, the Australian and New Zealand food supply may see imported food products containing soybean line MON94313. These may include soybean oil, milk, flour, meal, protein isolates and processed products.
7. The Call for Submissions concluded that food derived from soybean line MON94313 was as safe for human consumption as food derived from conventional soybean cultivars.
8. Applications have been made for approval on MON94313 in the EU, USA, Canada, Brazil, Japan Korea, Singapore, Taiwan and Thailand.
9. NZFGC supports the proposed amendment to Schedule 26 that would include a reference to food derived from soybean line MON94313 thereby permitting the use and sale of food from this soybean line in Australia and New Zealand.