



SUBMISSION

FSANZ 254-23

Application A1270

**Food derived from herbicide-tolerant and insect-protected
corn line DP51291**

PO Box 370
Braidwood NSW 2662

31 August 2023

Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604
AUSTRALIA

Re: Food derived from herbicide-tolerant and insect-protected corn line DP51291

Thank you for allowing Grain Producers Australia (GPA) the opportunity to provide a response to FSANZ regarding Corteva's application for corn line DP51291.

GPA's producer members play an important role maintaining food security in Australia and also support food supply throughout the globe, with about 60 per cent of the national crop exported each year.

GPA policy supports growers having access to crop biotechnology options to ensure they can continue contributing to domestic and global food security, whilst continuing to operate sustainable and profitably farming systems. There is overwhelming evidence produced over an extensive period on the successful production of canola and cotton crops in Australia, using biotechnology varieties to deliver agronomic, economic and environmental improvements and benefits.

GPA policy states:

'Access to new varieties which offer the opportunity for higher production, better performing varieties, varieties that better fit into weed and pest control management plans, varieties that offer additional marketing or differentiation options have all been made available to Australian producers due to the success of plant breeding. In some cases, the plant breeding techniques have been classified as falling under the banner of gene technology, in other cases they have not. GPA supports a national regulatory system which supports investment by providing clarity and, as far as possible, is consistent with international policy regarding the regulation of plant breeding techniques. Regardless of the plant breeding technique used, the merits of the varieties available should be assessed against clear, national science-based criteria, as regulated by the Office of the Gene Technology Regulator, and relevant regulation relevant to the APVMA and FSANZ. GPA supports a comprehensive, consistent and rigorous science-based assessment of novel plant breeding technologies species and products.'

The documentation provided by FSANZ on Corteva's application for corn line DP51291, as supporting information for submissions (the assessment documents A1270), was reviewed by GPA, whilst considering the context and intent of our biotechnology policy.

GPA notes the overseas experience of proven safety in approved corn varieties and that Corteva, and its predecessors, have extensive experience in grain science and regulatory requirements for approvals. In particular, we note that the result of the Safety assessment is:

"No potential public health and safety concerns have been identified in the assessment of herbicide-tolerant and insect-protected corn line DP51291. On the basis of the data provided in the present application and other available information, food derived from DP51291 is considered to be as safe for human consumption as food derived from non-GM corn cultivars."

GPA supports this application, recognising the scientific views provided in this safety assessment.

We note that the approval would not permit the GM corn to be grown in Australia or New Zealand.

In addition, we also note cultivation and whole food containing viable seeds (e.g. corn cobs) requires separate regulatory assessment and approval by the Gene Technology Regulator in Australia, and the Environmental Protection Authority in New Zealand.

GPA policy also encourages further education and public information provision on the uses of gene technology and novel plant breeding techniques. Our policy states:

'Consumer satisfaction and confidence is essential in maintaining, developing, and providing for the public good within the community. Current public understanding of the use of gene technology and new plant breeding techniques has been poorly managed. The need for further education and increased availability of scientific and factual information to the public is becoming of increasing importance to many consumers.'

We also note that approved food made from this type of GM corn could be imported into Australia and New Zealand in the form of starch, grits, meal, flour, oil and sweetener.

However, to help people make informed choices, food made from this corn must be labelled as 'genetically modified' if there was any novel DNA and/or novel proteins in the final food.

GPA views this labelling requirement as counterintuitive to the actual food safety declaration, with this approach being confusing and misleading for consumers, rather than properly educating them about the technology's value and efficacy. Claims of products being 'non-GM' can also be used to mislead consumers, under the false assumption of an implied safety concern, where none in fact exists. This has a longer-term impact on overall confidence in plant biotechnology and diminishes the ability to properly educate consumers and the general public.

If you would like to discuss any of these comments further in detail, please contact me on email colin.bettles@grainproducers.com.au or mobile 0439 901 970.

Yours sincerely



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GPA's Representative Roles and Responsibilities

Grain Producers Australia represents the interests of an estimated 21,000 grain producers who grow broadacre, grain, pulse and oilseed crops throughout Australia, contributing to the social and economic strength of their communities, and the national economy. GPA advocates national policy outcomes with benefits for grain producers and to deliver a more profitable, sustainable and globally competitive Australian grains industry. As a not-for-profit company limited by guarantee, GPA is governed by a board that's elected by producer members, representing the major grain producing regions. GPA's membership comprises direct producer members and producer members of the Grains Councils of State Farming Organisations. The elected leaders of these groups – backed by professional staff – also represent their members' interests, via the GPA Policy Council.

GPA's State Members include:

- AgForce Grains
- Grain Producers SA
- NSW Farmers Association
- Victorian Farmers' Federation Grains Group
- Tasmanian Farmers and Graziers Association
- WAFarmers Grains Council
- WA Grains Group

This robust representative process also engages and enables producers to advocate their views and deliver policy outcomes via various GPA Sub-Committees and Taskforces, such as the GPA Biosecurity Committee and GPA Pesticides and Technology Sub-Committee.

GPA's objectives are to:

- Provide a strong, independent, national advocate for grain producers based on a rigorous and transparent policy development process.
- Engage all sectors of the Australian grains industry to ensure operation of the most efficient and profitable grain supply chain.
- Facilitate a strategic approach to research, development and extension intended to deliver sound commercial outcomes from industry research.

GPA's responsibilities representing the interests of Australia's levy-paying grain producers are legitimised under federal legislation. This includes; managing biosecurity for the Australian grains industry through Plant Health Australia as a signatory to the Emergency Pest Plant Response Deed (EPPRD); as a joint Representative Organisation responsible for overseeing the Grains Research and Development Corporation's performance and strategic investment, with matching Federal Government funding, in RD&E activities, under the PIRD Act; and managing the risk of chemical residues and environmental contaminants in grain products, to help facilitate access to domestic and export markets and protect product integrity and export reputation, via the National Residue Survey.

Grain growers contribute 1.02 per cent of their net crop sales toward levies comprising the GRDC the EPPRD responsibilities, Plant Health Australia membership, National Residue Survey testing. Of that, the vast majority (0.99pc) goes to the GRDC, with PHA receiving 0.01pc, the NRS 0.015pc and emergency plant protection response the remaining 0.005pc.

Further information: <https://www.grainproducers.com.au/>