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To whom it concerns,

I am a Professor of Sociology at the University of Queensland, and over the last 25 years have been engaged in research to understand consumer attitudes to 'novel' foods, as well as governance and regulation to ensure governments and the private sector uphold responsibilities to broader Australians. Informed by this analysis, I am deeply concerned by the latest proposal by FSANZ - which would mean the further dilution of an already very poor starting point regarding food standards and consumer safety and right to know in Australia.

Polling shows most Australians, and global citizens don't want to eat genetically modified (GM) foods. All GM foods should be independently assessed for their health and environmental hazards and risks, be labelled as GM, and be traceable. This will allow farmers, food producers, retailers, and shoppers to avoid them, for many important reasons.

I therefore strongly oppose changes to the Food Code that would allow a wide range of GM foods, made using novel methods that have scant history of safe use, to be sold without safety assessment or labelling. These would include meat and milk from some genetically modified animals and substances like vanilla and stevia produced by genetically modified microbes in factory vats. These changes would undermine FSANZ's key responsibilities to ensure food safety and our right to know what is in our food.

Agrochemical companies cannot be trusted to self-assess the safety of GM foods as they have an appalling record of manipulating data to promote dangerous products.

Gene editing techniques have been found to make genetic changes that could never occur in nature and to result in widespread genetic damage that often goes undetected by GM developers.

I am deeply concerned that FSANZ has relied on advice from scientists with serious conflicts of interest, to conclude these new GM foods pose no greater risks than existing foods. Those seeking to commercialise GM plants, animals and microbes should play no role in deciding how - or even whether - foods derived from them should be regulated.

The proposed changes would make Australia one of very few countries in the world to allow genetically modified animal products into our food chain with no regulation or labelling. This would put us at odds with our international trading partners, which FSANZ admits "may have a significant impact on trade". The Cartagena Protocol on Biosafety, an international agreement signed by 166 governments worldwide, and the UN's food standards body Codex Alimentarius agree that all GM techniques differ from conventional breeding and that pre-market safety assessments are essential before GM organisms are used in food.

I support expanding the definition for 'gene technology' so FSANZ continues to assess and regulate all techniques and methods of genetic modification, other than conventional breeding. The proposal to deregulate new and emerging GM techniques and their food products, which pose new and unassessed risks, is completely unacceptable.

Thank you for taking my well-founded and informed concerns into consideration.

Yours sincerely,

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