

# Australian Food and Grocery Council SUBMISSION

09 FEBRUARY 2011

**TO:**

FOOD STANDARDS AUSTRALIA NEW ZEALAND

**IN RESPONSE TO:**

A1042- FOOD DERIVED FROM HERBICIDE-TOLERANT  
CORN LINE DAS-40278-9.



The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors. (A list of members is included as Appendix A.)

With an annual turnover of \$100 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector<sup>1</sup> is Australia's largest and most important manufacturing industry. Representing 28 per cent of total manufacturing turnover, the sector is comparable in size to the Australian mining sector and is more than four times larger than the automotive sector.

The growing and sustainable industry is made up of 38,000 businesses and accounts for \$49 billion of the nation's international trade. The industry's total sales and service income in 2007-08 was \$100 billion and value added increased to nearly \$27 billion<sup>2</sup>. The industry spends about \$3.8 billion a year on capital investment and over \$500 million a year on research and development.

The food and grocery manufacturing sector employs more than 315,000 representing about 3 per cent of all employed people in Australia paying around \$14 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia<sup>3</sup>. It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

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<sup>1</sup> Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc..

<sup>2</sup> AFGC and KMPG. State of the Industry 2009. Essential information: facts and figures. Australian Food and Grocery Council. Oct 2009.

<sup>3</sup> About Australia: [www.dfat.gov.au](http://www.dfat.gov.au)

## 1. INTRODUCTION

AFGC welcomes the opportunity to make this submission to the Food Standards Australia New Zealand in response to the assessment report for Application *A1042- Food Derived from Herbicide-Tolerant Corn*.

AFGC notes the intent of this application is to amend Standard 1.5.2 – Food produced using Gene Technology, in the Australia New Zealand Food Standards Code, to permit the sale and use of include food derived from corn line DAS-40278-9 in Standard 1.5.2.

The AFGC supports this application on the basis that there is no identified risk to public health and safety, and that it is then up to companies and individuals to make their own independent commercial decisions as to whether or not to use this product.

### Recommendation

**That FSANZ propose amending Table to clause 2 in Standard 1.5.2 – Food produced using Gene Technology to include food derived from corn line DAS-40278-9.**

## 2. SPECIFIC COMMENTS

### 2.1. The Application

AFGC notes that the draft assessment report has considered the genetic modification used in this plant, the potential toxicity and allergenicity of the novel protein, and the comparison of the genetically modified plant with that of a conventional plant.

FSANZ did not identify any public health and safety concerns, and concluded that food derived from corn line DAS-40278-9 is as safe and wholesome as the equivalent commercial counterpart, and there were no compositional differences of biological significance compared to conventional (non-GM) corn.

### 2.2. Consumer information

AFGC supports the advice that labelling of foods derived from corn line DAS-40278-9 will be required if they contain novel DNA or novel protein, consistent with the current requirements of the Standard.

The AFGC considers that the current requirements of the Food Standards Code adequately address consumer needs for appropriate information and labelling for foods produced using gene technology. The assessment process undertaken by FSANZ provides consumers with independently verified factual information and appropriate label requirements, where novel DNA or novel proteins are present, to ensure consumers are able to make an informed choice.

The AFGC Product Information Form (PIF) may be of assistance to companies in identifying GM ingredients, and components of ingredients, and to ensure compliance with labelling requirements.

## Membership as at 13 December 2010

Arnott's Biscuits Limited  
 Asia-Pacific Blending Corporation P/L  
 Barilla Australia Pty Ltd  
 Beak & Johnston Pty Ltd  
 Beerenberg Pty Ltd  
 Bickfords Australia  
 BOC Gases Australia Limited  
 Bronte Industries Pty Ltd  
 Bulla Dairy Foods  
 Bundaberg Brewed Drinks Pty Ltd  
 Bundaberg Sugar Limited  
 Byford Flour Mills T/a Millers Foods  
 Campbell's Soup Australia  
 Cantarella Bros Pty Ltd  
 Cerebos (Australia) Limited  
 Cheetham Salt Ltd  
 Christie Tea Pty Ltd  
 Church & Dwight (Australia) Pty Ltd  
 Clorox Australia Pty Ltd  
 Coca-Cola Amatil (Aust) Limited  
 Coca-Cola South Pacific Pty Ltd  
 Colgate-Palmolive Pty Ltd  
 Coopers Brewery Limited  
 Danisco Australia Pty Ltd  
 Devro Pty Ltd  
 DSM Food Specialties Australia Pty Ltd  
 Earlee Products  
 Eagle Boys Pizza  
 FPM Cereal Milling Systems Pty Ltd  
 Ferrero Australia  
 Fibrisol Services Australia Pty Ltd  
 Fonterra Brands (Australia) Pty Ltd  
 Food Spectrum Group  
 Foster's Group Limited  
 Frucor Beverages (Australia)  
 General Mills Australia Pty Ltd  
 George Weston Foods Limited  
 GlaxoSmithKline Consumer Healthcare  
 Go Natural  
 Goodman Fielder Limited  
 Gourmet Food Holdings  
 H J Heinz Company Australia Limited  
 Harvest FreshCuts Pty Ltd  
 Healthy Snacks  
 Hela Schwarz  
 Hoyt Food Manufacturing Industries P/L  
 Hungry Jack's Australia  
 Johnson & Johnson Pacific Pty Ltd  
 Kellogg (Australia) Pty Ltd

Kerry Ingredients Australia Pty Ltd  
 Kimberly-Clark Australia Pty Ltd  
 Kraft Foods Asia Pacific  
 Laucke Flour Mills  
 Madura Tea Estates  
 Manildra Harwood Sugars  
 Mars Australia  
 McCain Foods (Aust) Pty Ltd  
 McCormick Foods Aust. Pty Ltd  
 McDonald's Australia  
 Merisant Manufacturing Aust. Pty Ltd  
 National Foods Limited  
 Nerada Tea Pty Ltd  
 Nestlé Australia Limited  
 Nutricia Australia Pty Ltd  
 Ocean Spray International Inc  
 Parmalat Australia Limited  
 Patties Foods Pty Ltd  
 Procter & Gamble Australia Pty Ltd  
 Queen Fine Foods Pty Ltd  
 QSR Holdings  
 Reckitt Benckiser (Aust) Pty Ltd  
 Sanitarium Health Food Company  
 Sara Lee Australia  
 SCA Hygiene Australasia  
 Schweppes Australia  
 Sensient Technologies  
 Simplot Australia Pty Ltd  
 Spicemasters of Australia Pty Ltd  
 Stuart Alexander & Co Pty Ltd  
 Sugar Australia Pty Ltd  
 SunRice  
 Swift Australia Pty Ltd  
 Tasmanian Flour Mills Pty Ltd  
 Tate & Lyle ANZ  
 The Smith's Snackfood Co.  
 The Wrigley Company  
 Tixana Pty Ltd  
 Unilever Australasia  
 Vital Health Foods (Australia) Pty Ltd  
 Wyeth Australia Pty Ltd  
 Yakult Australia Pty Ltd  
 Yum Restaurants International

### Associate & \*Affiliate Members

Accenture  
 Australian Pork Limited  
 ACI Operations Pty Ltd

Amcor Fibre Packaging  
 \*ASMI  
 AT Kearney  
 BRI Australia Pty Ltd  
 \*Baking Association Australia  
 CAS Systems of Australia  
 CHEP Asia-Pacific  
 CSIRO Food and Nutritional Sciences  
 CoreProcess (Australia) Pty Ltd  
 Dairy Australia  
 Food Liaison Pty Ltd  
 FoodLegal  
 \*Foodservice Suppliers Ass. Aust.  
 \*Food industry Association WA  
 Foodbank Australia Limited  
 \*Go Grains Health & Nutrition Ltd  
 GS1  
 Harris Smith  
 IBM Business Cons Svcs  
 innovations & solutions  
 KN3W Ideas Pty Ltd  
 KPMG  
 Leadership Solutions  
 Legal Finesse  
 Linfox Australia Pty Ltd  
 Meat and Livestock Australia Limited  
 Monsanto Australia Limited  
 New Zealand Trade and Enterprise  
 RQA Asia Pacific  
 StayinFront Group Australia  
 Strikefoce Alliance  
 Swire Cold Storage  
 Swisslog Australia Pty Ltd  
 The Food Group Australia  
 The Nielsen Company  
 Touchstone Cons. Australia Pty Ltd  
 Valesco Consulting FZE  
 Visy Pak  
 Wiley & Co Pty Ltd

### PSF Members

Amcor Fibre Packaging  
 Bundaberg Brewed Drinks Pty Ltd  
 Schweppes Australia Pty Ltd  
 Coca-Cola Amatil (Aust) Limited  
 Foster's Group Limited  
 Golden Circle Limited  
 Lion Nathan Limited

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