



29 September 2011

Project Officer Application A1051
Food Standards Australia New Zealand
PO Box 10559
The Terrace
WELLINGTON 6036

FS350-117-1051

Dear Sir/Madam

Application A1051 – Food derived from Herbicide-tolerant Soybean Line FG72 – Assessment Report

Thank you for the opportunity to comment on this application. The Ministry of Agriculture and Forestry (MAF) has the following comments to make.

On the basis of the information presented in the assessment report, we agree that no public health or safety concerns have been identified in the assessment for food derived from soybean line FG72. The availability of some of the information from the applicant was helpful during the review.

We note some errors in the referencing of the tables in Supporting Document 1 (table 7 onwards, where the text does not match the table number).

Table 17 summarises the information for vitamins. In relation to vitamin A, we wonder if the 5th bullet point in section 6.3.7 could be more clearly worded around the differences noted. Differences between sprayed and unsprayed FG72, and “Jack”, were found for vitamin A and total tocopherols. The aggregate vitamin A difference was discounted due to a significant treatment*site interaction, but it is stated there were significant differences between treatments on a by site basis. Examination of the Bayer reports (Mackie, 2009; Rattemeyer, 2008) shows that evaluation of the vitamin A results was complicated by the large number of results below the limit of quantitation (LOQ). While these results were assigned the LOQ value of 0.200 ppm for aggregate analysis, these results prevented the by site analysis for seven of the ten sites. In the context of the high proportion of <LOQ results, and as the results are within the literature range, we do not believe these differences raise safety concerns.

There is also what seems to be an error in the table in Section 6.3.8. As all results for the three non-GM cultivars used to establish the tolerance range were <LOQ the results for FG72 are not within the tolerance range.



Ministry of Agriculture and Forestry
Te Manatū Ahuwhenua, Ngāherehere
Pastoral House, 25 The Terrace, PO Box 2526, Wellington, 6140, New Zealand
Telephone: 0800 00 83 33, Web: www.maf.govt.nz



Yours sincerely

Jenny Reid
Manager Food Safety