

## Coughlan, Christine

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**From:** Sarah Mitchell [REDACTED]  
**Sent:** Friday, 7 July 2017 11:22 AM  
**To:** submissions  
**Subject:** Submission To FSANZ      Application A 1139

### **Submission To FSANZ      Application A 1139**

Name of submitter: Sarah Mitchell (postgraduate student, Public Health)

Contact details: [REDACTED]

Email: [REDACTED]

Phone: [REDACTED]

### **I ask that FSANZ decline the approval of application A1139 - Food derived from Potato Lines E56, F10, J3, W8, X17 & Y9.**

- I strongly object to FSANZ approving application A1139 - Food derived from Potato Lines E56, F10, J3, W8, X17 & Y9. I ask that FSANZ decline the application
- There is no comprehensive data showing evidence of unintended effects of the transgenic potato lines. This makes it mandatory for FSANZ to decline the approval.
- It is necessary for FSANZ to require whole genome sequencing to identify off-target mutations and also essential to ascertain the effects of unintended changes on global patterns of gene function.
- FSANZ must require sequencing using molecular profiling analyses or “omics”-
  - *transcriptomics* — gene expression profiling,
  - *proteomics* — protein composition profiling,
  - *metabolomics* — profiling of metabolites,
  - *miR-omics* – microRNA profiling

- The best evidence available for effective safety assessment also requires long-term toxicity studies in established animal model systems. In the absence of these data to inform FSANZ, there can be no legal approval of A1139.
- The APHIS documentation shows that these GE potato lines offer no nutritional advantage, as there are non-GE potato varieties that are naturally low in the desired profiles. This demonstrates that there is no need for approval of the GE potatoes.
- Instead of approving this application, FSANZ could instead recommend non-GE potato varieties that have naturally-occurring low levels of compounds responsible for acrylamide production. They could also educate food businesses on storing and cooking procedures that minimize acrylamide production.
- The FSANZ assessment is compromised with respect to rigorous scientific procedure. These GE potato lines cannot be approved for the human or animal consumption, without the provision of comprehensive information regarding compositional differences to their non-GE counterparts. Compositional analyses are very limited in that they can only assay for known compounds. Any novel compounds would not be detected in such analyses.
- FSANZ must provide evidence of safety, when eaten, in the lines that have significant variations in nutrients, or more importantly anti-nutrients. Anti nutrients such as glycoalkaloids can be highly toxic for consumers.
- The afore-mentioned studies have not been carried out and in their absence, there should be no legal approval of the A1139 application.

Other risks from an approval by FSANZ that must be recognised as unacceptable to the public.

- There is no consumer benefit or nutritional benefit from the GE potatoes listed in this application to outweigh known and unknown risks, compared to existing potato varieties that industry can use.
- Whole or even very small parts of any uncooked (raw) tubers endanger New Zealand's biosecurity. GE potatoes could either potentially be planted without regulation or establish themselves as wild populations.
- Approval will constitute a total disregard for the health of consumers, by denying them their right to know what they are eating. There is no requirement for GE foods sold by fast food and other restaurants to be labelled as such, so as to inform consumers. This would leave the public in the dark and result in unwilling and unwitting consumption of GE potatoes.
- The GE potato lines' compositions are significantly different to their parent line. This shows that the GE process has disrupted the cellular metabolism. As there are no feeding studies to evaluate these effects, it is not possible to conclude that there are no biologically relevant differences.
- Reliance on industry claims of safety is irresponsible and dangerous.
- Allowing genetically modified crops into New Zealand is also likely to increase consumer's exposure to harmful herbicides such as glyphosate.

Please see the document GMO Myths and Truths for detailed information on the lack of evidence for safety and effectiveness of GMO crops.

(<http://earthopenSource.org/wordpress/downloads/GMO-Myths-and-Truths-edition2.pdf>)

Yours sincerely,

Sarah Mitchell