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**From:** [REDACTED]  
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**Subject:** submission on A 1139

**Categories:** [REDACTED]

Application A 1139

Submission by The Auckland GE-free Coalition (AGEFC)

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[REDACTED]

**AGEFC strongly oppose the application and ask FSANZ to decline approval of A1139 - Food derived from Potato Lines E56, F10, J3, W8, X17 & Y9.**

The AGEFC is a network of concerned individuals and community groups representing the public concerns around the risks and regulation of GMOs since the early 2000's.

As industry and regulatory authorities have sought to push GMO foods into the New Zealand food chain AGEFC has sought consumer choice to avoid GM food, and proper independent testing and monitoring of novel foods.

The application fails on these and other counts and we ask that the application not be approved.

**The systems and processes used to assess safety, and to approve and monitor labelling compliance of this (and previous similar applications) are failing or not fit for purpose.**

Latest scientific understanding shows they lack the rigor and comprehensive data needed to make a genuine and credible safety assessment. To continue with an approval in knowledge of this would be unethical.

**The lack of labeling requirements at likely sales channels for these GMO products, is a serious breach of choice for consumers.**

The lack of mandatory labelling for food sold by restaurants is likely to lead to deception and unconsensual consumption of GE potatoes by consumers. The lack of enforcement and monitoring of compliance in GM food labelling by FSANZ is remiss and approval of the application would add to this, and be against the public interest.

**In the absence of long term feeding studies and 'omic' analysis that have been identified as necessary and best practice by independent experts, to understand the changes and potential implications for food safety, FSANZ is erring by making a decision based on assumptions and inadequate data.**

In the absence of full data it is not possible for FSANZ to support the claim made that:

**FSANZ know that there are unexpected off-target effects** resulting from genetic engineering, including from much hyped 'accurate and precise' recent advances using CRISPR.

The complexity of unexpected risk is made clear by recent [study in mice](#), which found that the large numbers of off-target mutations caused by CRISPR in mice could not be predicted by the usual computer algorithms.

Schaefer KA, Wu W-H, Colgan DF, Tsang SH, Bassuk AG, Mahajan VB. Unexpected mutations after CRISPR-Cas9 editing in vivo. Nat Methods. 2017;14(6):547-548. doi:10.1038/nmeth.4293.

<https://www.nature.com/nmeth/journal/v14/n6/full/nmeth.4293.html>

**FSANZ is in error by relying on the inadequate data and claims of the applicant.** Independent scientific comment highlights that the data available for assessment by FSANZ is inadequate for any approval to be legitimate or to meet FSANZ's legislated responsibility.

**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.

**Also required is sequencing using other molecular profiling analyses : “omics”-** transcriptomics — gene expression profiling, proteomics — protein composition profiling, metabolomics — profiling of metabolites, and miR-omics – microRNA profiling.

**It is necessary for FSANZ to require long-term toxicity studies in established animal model systems.** The compositional alterations in these and other food products produced with Genetic Engineering will not be fully revealed by the molecular profiling methods due to the current inherent limitations of these techniques.

**In the absence of these data to inform FSANZ, there can be no legitimate approval of the application.**

**There is also a significant biosecurity risk and potential threat to local growers and exporters arising from these GMO potatoes.**

Contamination of conventional food by GMO elements has led to loss of exports and economic harm in the past and continues to be an economic threat that FSANZ fail to properly address.

It is illegal to import viable genetically modified plants into New Zealand. Even parts of non-whole tubers can be viable and thus endanger the New Zealand biosecurity status. It would be illegal to approve these potatoes into the country.

**AGEFC ask FSANZ to recognise and respond to the public concern and to support the public interest by not approving the application.**