

**Submission to Application A1129-Food Derived from Potato Lines F10, J3, W8, X17 & Y9.**

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**Statement:**

- 1.) I am an environmentalist and a retired DOC ranger.
- 2.) I hold a B.Sc from Aberdeen University (1970).
- 3.) I have no pecuniary or trade interest in the outcome of this application.

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

**I strongly object to FSANZ approving application A1139** - Food derived from Potato Lines F10, J3, W8, X17 & Y9.

**Reasons:**

- 1.) There is no audited, independent peer-reviewed certification to the effect that the authors of the food safety data accompanying the application were not in any way funded, favoured or supported by the applicant or any of the applicant's proxies, so the validity of the information cannot be assured.
  - 2.) There is no comprehensive data showing evidence of unintended effects of the transgenic potato lines.
  - 3.) 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 has failed to require this.
  - 4.) 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
  - 5.) 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.
  - 6.) 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.
  - 7.) 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.
  - 8.) 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.
- Since the afore-mentioned studies have not been carried out and in their absence, there can be no legal approval of the A1139 application.

**End of submission.**

30 June 2017