



# AUSTRALIAN FOOD SOVEREIGNTY ALLIANCE

## **Submission on Food Derived from Innate Potato Lines V11 and Z6**

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<b><u>ABOUT THE AUSTRALIAN FOOD SOVEREIGNTY ALLIANCE (AFSA)</u></b>	<b><u>3</u></b>
<b><u>CONTEXT</u></b>	<b><u>4</u></b>
<b><u>RECOMMENDATIONS</u></b>	<b><u>4</u></b>
<b><u>ISSUES</u></b>	<b><u>4</u></b>
<b>THE RISK ASSESSMENT CONDUCTED BY FSANZ FAILS TO TAKE INTO ACCOUNT POTENTIAL HEALTH ISSUES</b>	<b>4</b>
<b>GENETICALLY MODIFIED INGREDIENTS</b>	<b>5</b>
<b><u>ABOUT FOOD SOVEREIGNTY</u></b>	<b><u>6</u></b>

## About the Australian Food Sovereignty Alliance (AFSA)

The Australian Food Sovereignty Alliance (AFSA) is a farmer-led civil society organisation made up of organisations and individuals working together towards a food system in which people can create, manage, and choose their food and agriculture systems. AFSA is an independent organisation not aligned with any political party. We have around 700 farmer, individual, and organisational members.

AFSA provides a balanced voice to represent farmers. We connect small- and medium-scale Australian farmers for farmer-to-farmer knowledge sharing, work with all levels of government for scale-appropriate and consistent regulations and standards for agriculture, and advocate for fair pricing for those selling to the domestic market.

We are part of a robust global network of civil society organisations involved in food sovereignty and food security policy development and advocacy. We are members of the International Planning Committee for Food Sovereignty (IPC), La Via Campesina – the global movement of peasant farmers, and Urgenci: the International Network for Community-Supported Agriculture, and work regularly with Slow Food International and many of its Australian chapters. We also support the Australasian representative on the Civil Society Mechanism (CSM), which relates to the UN Committee on World Food Security (CFS).

Our vision is to enable regenerative and agroecological farming businesses to thrive. Australians care now more than ever about the way their food is produced, including its social and environmental impacts. Food produced on small- and medium-scale regenerative farms is increasingly in demand, and government is bound to heed changing community expectations and facilitate and encourage the growth and viability of regenerative agriculture, thereby protecting the environment and human and animal health.

As a key stakeholder and representative body of small- and medium-scale producers Australia-wide, AFSA is appreciative of the opportunity to submit on SPS International Inc's application for the sale of products derived from genetically modified disease-resistant potatoes.

## Context

On 22 May 2020 Food Standards Australia New Zealand (**FSANZ**) called for comment on an application by SPS International Inc (SPSII), a subsidiary of J.R Simplot Company (Simplot), for approval for the sale of food from potatoes (lines V11 and Z6) that have disease resistance to foliar late blight, reduced blackspot bruising and reduced acrylamide potential.

## Recommendations

<b>Recommendation 1</b>	FSANZ should investigate more thoroughly the risks associated with GM potatoes as there are potential public health and safety concerns.
<b>Recommendation 2</b>	Any permission granted to SPSII should be qualified with strict labelling requirements imposed so that a purchaser is clearly informed that the food derived from Innate potatoes contain genetically modified ingredients.

## Issues

The risk assessment conducted by FSANZ fails to take into account potential health issues

While the FSANZ Safety Assessment Report concludes there are no health and safety risks associated with food derived from Innate potato lines V11 and Z6, it is not clear where or by whom the testing referenced within the report was conducted, therefore the independence of the testing upon which the assessment has been made is not clear. Whilst FSANZ conducts paper reviews as a “standard scientific method of evaluation used by regulators around the world”<sup>1</sup>, AFSA would maintain that this approach is too narrow and fails to pick up emerging views such as those of departing scientist formerly employed by Simplot, Caius Rommens.

Caius Rommens, the genetic engineer at Simplot Plant Sciences who led the development of the company’s genetically engineered Innate potato now has “serious doubts about his work” and is “worried about potential health risks from eating the GMO potatoes”. He has stated:

*My concern about genetic engineering is that the absence of unintentional effects can never be guaranteed. It may take dozens of years before these effects reveal themselves, and we should be extremely cautious applying the technology.*<sup>2</sup>

AFSA submits that FSANZ should investigate more thoroughly the risks associated with Innate potatoes and appreciates that calling for submissions is in part designed to bring such issues to the

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<sup>1</sup> <https://www.foodstandards.gov.au/consumer/gmfood/safety/Pages/default.aspx>

<sup>2</sup> <https://www.ecowatch.com/gmo-potato-simplot-health-fears-2618087647.html>

fore. As such we look forward to further, genuine consultation in relation to this application.

### Genetically modified ingredients

The key ingredient in the applicant's product is known as "heme" or soy leghemoglobin. This heme is genetically engineered by adding soy protein to genetically engineered yeast.

Genetically modified food has been around for decades now. Toxicity arising from the consumption of genetically modified food is now a well-known and much debated malady<sup>3</sup>. Given the health risks associated with genetically modified foods, we would argue that the applicant's products need to be clearly labelled as genetically modified.

Whilst we note in the application that SPII does not "currently intend to import food derived from potato lines V11 and Z6 into Australia and New Zealand", AFSA nonetheless would ask that any permission granted to SPII should be qualified with strict labelling requirements imposed so that a purchaser is clearly informed that the food substitute contains genetically modified ingredients. We would suggest these needs to be both a GM food warning, as well as the fact the potatoes from which the food has been derived are not Australian grown. This is because AFSA believes that consumers deserve the opportunity and indeed have the basic human right to make informed choices about their food purchases.

AFSA thanks FSANZ for the opportunity to submit and would welcome further discussion on this application.

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<sup>3</sup> "Will GMOs Hurt my Body? The Public's Concerns and How Scientists have Addressed Them"  
<http://sitn.hms.harvard.edu/flash/2015/will-gmos-hurt-my-body/>

## About Food Sovereignty

*“Food sovereignty asserts the right of peoples to nourishing and culturally-appropriate food produced and distributed in ecologically-sound and ethical ways, and their right to collectively determine their own food and agriculture systems.”<sup>4</sup>*

The core of food sovereignty lies in the following principles:

- Food is a human need and a basic right, rather than a commodity.
- Food systems should be democratically constructed, responding to diverse social, cultural and environmental conditions.
- Food systems should be based on a strong commitment to social justice: for farmers, food system workers, and the most vulnerable members of our society who experience food insecurity.
- Resilient food systems require long-term environmental sustainability, transitioning away from dependence on fossil fuels and chemical inputs.
- Resilient and sustainable food systems will be more localised and regionalised.
- Trade in food and agricultural products can enhance economic and social well-being but should be conducted on the basis of international solidarity, respecting and not undermining the food sovereignty ambitions of other peoples and countries.<sup>5</sup>

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<sup>4</sup> The Australian Food Sovereignty Alliance, <<https://afsa.org.au/?s=food+sovereignty+>>.

<sup>5</sup> Patel, R. (2009). What does food sovereignty look like? *Journal of Peasant Studies*, 36(3), 663-671.