

Project Officer Application A1202  
Food Standards Australia New Zealand

12 November 2020

Tēnā koe

## Application A1202 – Food derived from herbicide-tolerant and insect-protected corn line DP23211

Thank you for the opportunity to comment on this application.

New Zealand Food Safety (NZFS) agrees with the FSANZ assessment that there are no public health and safety concerns associated with food derived from herbicide-tolerant and insect-protected corn line DP23211 as proposed. We have the following comments:

The assessment shows that spraying of DP23211 with glufosinate would result in metabolites that are also produced in non-GM crops sprayed with the same herbicide. However, we note that potential spray residue levels in DP23211 crops compared to non-tolerant/non-GM crops were not covered.

We also note that no guideline is referenced in the applicant's assessment on acute toxicity tests. For example, according to the OECD guideline, 2000 mg/kg is an acceptable dose and a higher dose (5000 mg/kg) should only be used when justified by specific regulatory needs.

Specific comments in consultation with the Institute of Environmental Science and Research Limited (ESR):

The transformation itself is complex compared to other GM crops, but the characterisation of the inserted DNA and absence of rearrangements shows that the end result is as intended.

The acute oral toxicity study of IPD072Aa in mice would have been improved by using additional higher doses to identify any potential adverse effects in mammals.

We are happy to discuss the points raised above.

Nāku noa, nā

  
  
Manager Food Science