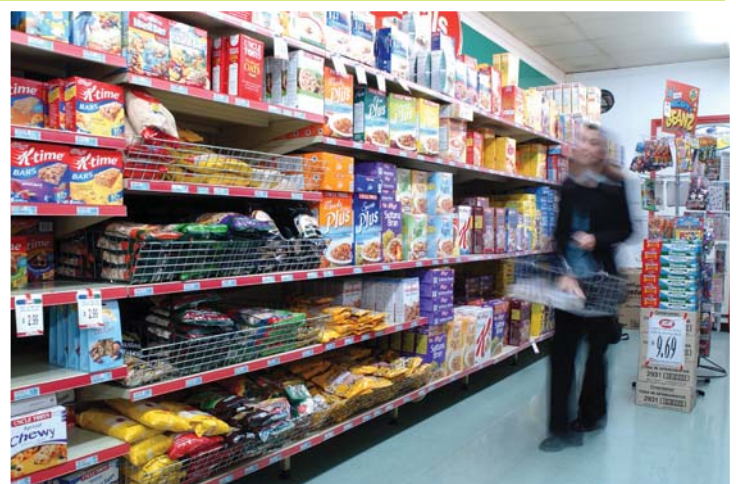
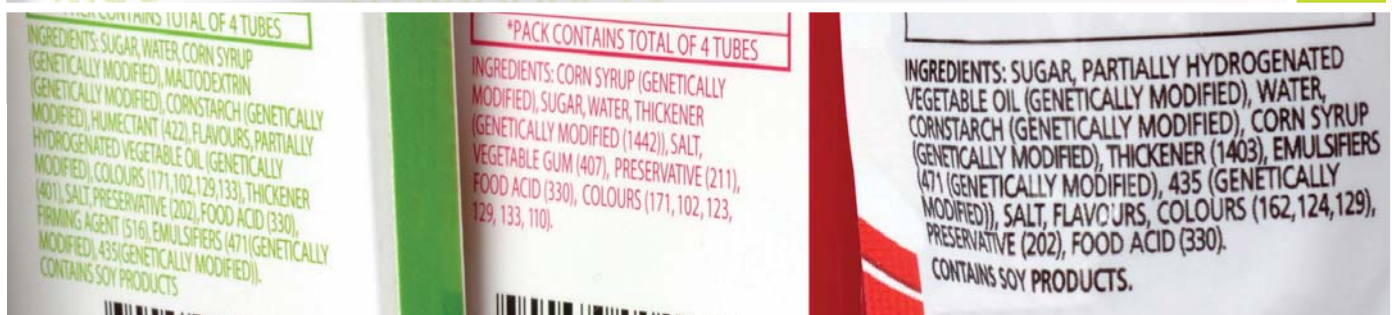


GM Food Labelling in Australia

Delivering affordable choice



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A D I C
Australian Dairy Industry Council Inc.

CropLife
AUSTRALIA

sugarcane gene technology group

SFMCA
Stock Feed Manufacturers' Council of Australia

EXECUTIVE SUMMARY

- > Australian industry supports the regulation and safety of foods and ingredients derived from genetically modified (GM) crops approved by Food Standards Australia New Zealand (FSANZ).
- > Australian industry supports Australia's current GM food labelling laws. The laws provide consumer choice, and are practical, realistic, proven and enforceable.
- > Australian industry does not support changing the laws to incorporate the labelling of highly refined products derived from GM crops, such as oils and sugars, as these products cannot be differentiated from products made from conventional (non-GM) crops.
- > Australian industry does not support changing the laws to label end-products, such as meat, eggs and milk derived from animals fed GM feed. Nowhere in the world is such labelling required as these end-products cannot be differentiated from those where the animals have been fed a conventional (non-GM) diet.

OVERVIEW

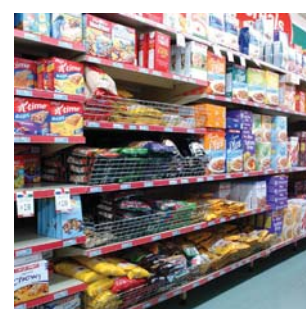
Genetically modified crops have been grown, traded and consumed around the world, including Australia, since 1996. In 2009, 134 million hectares of GM crops were planted in both developed and developing countries by fourteen million farmers in 25 countries.

In 1999 Australia's health ministers agreed to introduce a system for GM food labelling in Australia to facilitate consumer choice. This system came into effect in December 2001.

All GM ingredients that are allowed to be sold in Australia are safe. The Australia New Zealand Food Standards Code requires that all GM ingredients that are consumed in Australia undergo a thorough scientific safety assessment before they are allowed to be sold.

Any changes to the current GM labelling provisions would not enhance choice and could potentially reduce consumer options. Also, changes would place unrealistic expectations on agricultural industries, and would impose a financial cost on industry which would be reflected in the cost of food to consumers.

Australian industry supports the labelling of GM products, to support choice, where this is technically and economically feasible. We believe that the current Australian labelling laws are a good balance between consumer choice and the industry's ability to deliver products at affordable prices.



AUSTRALIA'S GM FOOD LABELLING

Australia implemented a labelling regime for GM foods in 2001 to allow consumers to identify foods with GM ingredients and facilitate choice. Generally, under this regime, if genetic material or protein from genetic modification is present in the final food it must be identified in the ingredient panel of the label.

There are several categories under which a food or ingredient does not require a GM label. These are:

- > Highly refined products
- > Additives and processing aids which do not contain novel DNA or protein
- > Foods containing GM flavouring of less than 0.1 per cent of the final food
- > GM foods intended for immediate consumption, such as restaurant and take-away foods and catered meals.

Also, there is an exemption for the unintended presence of a GM food, where it can be demonstrated to be unintentional and its presence is not more than one per cent per ingredient.

Finally, it should be noted that nowhere in the world is GM labelling required on end products, such as meat, eggs, and milk, derived from animals fed GM feed.

	per serve	
ENERGY	104kJ (25Cal)	1735kJ (415Cal)
PROTEIN	0.0g	0.02g
FAT - TOTAL	0.77g	12.8g
- SATURATED	0.19g	3.09g
CARBOHYDRATE	4.5g	74.8g
- SUGARS	4.2g	70.2g
SODIUM	13mg	209mg

INGREDIENTS: SUGAR, PARTIALLY HYDROGENATED VEGETABLE OIL (GENETICALLY MODIFIED), WATER, CORNSTARCH (GENETICALLY MODIFIED), CORN SYRUP (GENETICALLY MODIFIED), THICKENER (1403), EMULSIFIERS (471 (GENETICALLY MODIFIED), 435 (GENETICALLY MODIFIED)), SALT, FLAVOURS, COLOURS (162, 124, 129), PRESERVATIVE (202), FOOD ACID (330).

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Highly refined products

There is no need for the mandatory GM labelling of highly refined products, such as oils and sugars.

Many oils and sugars are considered to be 'highly refined' products meaning they have undergone a refining process that has the effect of removing and/or denaturing DNA and/or protein. For example, oil derived from GM crops cannot be differentiated from conventional (non-GM derived) crops and as a result there is no need for oil from the new GM canola varieties now growing in Australia to be labelled.

Despite advances in the sensitivity of modern testing technologies there is no detectable difference between products such as sugar and highly refined oils that are made from GM crops and those same products made from non-GM crops.

To enforce labelling provisions on highly refined oils would involve the implementation of a system that requires suppliers to trace back the source of production, with documentation at every step from the farm to the processing plant. Grain crops such as canola are currently transported and stored as bulk commodities to minimise transport and storage costs. A documentary process, combined with the added storage and handling costs would be both expensive and unnecessary, for a bulk commodity supply chain.

To incur added expense to separate products that are safe and unable to be differentiated from other source materials achieves nothing except higher prices for consumers. In addition to the greater costs such as added testing and infrastructure requirements for storage and transport, a change to the current labelling laws, could result in a situation where affected products may be widely, if not universally, labelled as "may contain" a GM ingredient. This would not increase consumer choice but may in fact lead to consumer confusion.



Food additives and processing aids

Food additives, such as preservatives and thickeners, are substances which are added to foods to achieve a technological function and normally remain present in the final food. Processing aids, such as the enzyme amylase, while also used in small amounts to perform a technological function in the processing of raw materials, are not normally present in the final food.

Under Australia's current GM food labelling laws, food additives and processing aids are not required to carry a GM label unless they are, or they contain, novel DNA or novel protein and the novel DNA or novel protein remains in the final food. Australian industry supports this position.



Flavourings

Flavourings are food additives that are concentrated natural or synthetic preparations added to foods to give taste and/or odour. They are used in small concentrations and are not meant to be consumed alone. Flavourings are at a concentration of less than 0.1 per cent in the majority of foods in which they are used but may be above this level in some highly flavoured products.

Where a flavouring containing a GM ingredient is added to a food and the concentration of that flavouring is no more than 0.1 per cent in the final food, no 'genetically modified' label is required.

Food for immediate consumption

Food for immediate consumption, such as restaurant meals, is not required to carry GM labels by the Food Standards Code. However State and Territory food legislation have general provisions which prohibit a food business or person from supplying food by way of sale if it is not of the nature or substance demanded by the purchaser. Therefore a consumer is entitled to request a food business to provide information on whether a GM ingredient has been used and the vendor is required to provide this information in a manner which is not misleading or untruthful.



Unintended presence

The establishment of a one per cent threshold for the unintended presence of an approved GM ingredient recognises that there could be some accidental mixing of GM commodities with non-GM commodities, based on the reality of agricultural supply chains and global trade. The use of common supply chains by both non-GM and GM producers creates the possibility that tiny amounts of a previously transported or processed commodity could be present in a commodity that later uses those same supply chains. This reality has been recognised by a range of governments around the world that have implemented GM labelling regimes. Two examples of this are the European Union with a threshold of 0.9 per cent, and Japan with a much greater five per cent threshold.



The lower this threshold is set the greater the cost to meet it, as the cost increases exponentially the closer the threshold is to zero. Increased testing, increased cleaning and potentially the use of specifically developed storage and distribution facilities all add to the final cost of the product. These costs will be passed on to consumers in the form of higher priced end products. Australian industry supports the current unintended presence threshold of one per cent.



Meat, milk and eggs from animals fed GM crops

No country in the world has introduced mandatory GM labelling for animal products such as meat, milk and eggs, from animals fed GM feed. Genetically modified animal feed, like all feed, is broken down during digestion and numerous peer-reviewed scientific studies have been conducted to evaluate the safety of GM animal feeds. Animal products derived from animals fed GM feed are identical to those from animals fed non-GM feed.

As there is no way to test or differentiate the final product any GM labelling system would have to rely on a documentation process. This is not economically feasible for bulk commodities destined for human consumption, let alone for commodities that are produced for animal feed. As with oils, there would be no additional consumer choice because the two products are identical. The only real effect on consumers of labelling these commodities is increased price for food without any benefit. Australian industry supports the position that these end products do not have to be labelled, which is a position supported around the world.



CONCLUSION

Australian health ministers agreed to a GM food labelling system in Australia in 1999. It should be noted, as articulated by Senator Grant Tambling the then Parliamentary Secretary to the Minister for Health and Aged Care, that "Ministers chose to fully label not because they had any safety concerns - they certainly did not - but to acknowledge consumers wanting more information about genetically modified foods."

(See: <http://www.health.gov.au/internet/main/publishing.nsf/Content/health-mediated-yr1999-gt-gtsp990827.htm>)

Australia's GM food labelling laws provide consumers with choice allowing them to clearly identify GM ingredients. Some exemptions apply in cases where the inclusion of GM material can be demonstrated to be unintentional, where a flavouring or processing aid has been used at less than 0.1 per cent of the ingredient, or where the end product cannot be differentiated.

The Australian industry believes the current laws provide choice and are also practical. A move to include currently exempt GM ingredients in mandatory labelling laws would remove choice, increase the cost of the end product, and in the case where refined products are required to be labelled a situation of 'may contain' labels may emerge, thereby serving only to reduce consumer choice.