GE Free New Zealand

In Food And Environment Inc.

PO Box 13402, Wellington, NZ

18 Jan 2018

Dear Jenny,

We are very concerned over the responses you have given to the issues on A1138 raised in our letter. We would still like a meeting before you put in your recommendation to the Minister.

There are three new proteins expressed in the Rice event GR2E and these proteins have changes that are potentially toxic, allergenic or have sub chronic histological effects.

The unintended effects of GR2E regarding the PMI protein. The applicant detailed alterations to the proteins expressed and stated that these changes had not been assessed by FSANZ. FSANZ acknowledged in their Supporting Document 1 that the PMI protein was different to the ones assessed in the maize (p.23 footnote 8). The protein changes caused by the PMI in rice might be similar to the MIR162, line 3272 and line 5307 but the MIR162 line did not produce alterations to the proteins in the maize in the way the PMI protein in the rice has done. Therefore these new proteins need to be tested for as stated in the Codex guidelines.

Regarding, similarity of LAAO to snake venom, the LAAO enzyme performs in a myriad of biological activities including apoptosis-induction, edema-induction, hemorrhaging, and inhibition or induction of platelet aggregation. As the control rice does not contain LAAO it is not acceptable to bring in a wild rice that may not be eaten by the population. This misleads and dismisses the serious nature of the presence of the toxic similarities to snake venom of these LAAOs. There needs to be feeding tests undertaken on the GR2E rice on consumption.

Dr. Puztai findings on using the isolated snowdrop lectin (GNA –GM) as a powder compared with the transgenic GNA expressed in the GM there were significant differences in the rat intestines[1]. So regarding the microbial expressed CRTI that was isolated and fed to rats there is a strong possibility that the transgenic carotene CRTI expressed in GR2E would have similar differences to Puztai's potatoes. Ingesting this rice could be a health hazard for consumers.

The EU guidelines for any transgenic food that has significant biological/nutritional/toxic changes compared to its conventional comparator require a 90 day oral feeding test[2] (p.32-33).

As there is an absence of feeding studies and published data on A1138, and considering this rice has significantly altered, potentially toxic and allergenic properties, we call on the forum policy advisors at MPI advise the Minister to appeal this approval and ask for a 90 day feeding

[1] http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736(98)05860-7.pdf
[2] http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R0503&from=EN

study that is peer reviewed and published following internationally accepted guidelines. Especially as babies are early and high consumers of rice based foods and a rice allergy is relatively uncommon[3] it is essential that this rice does not increase the hazard levels alaphylaxis, allergies and gut disorders.

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[3] http://www.swallergy.com/rice-allergy.html