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12 October 2004

Fair Trading Branch  
Commerce Commission  
PO Box 2351  
WELLINGTON

Dear Ms Popovic

**Discussion Paper on Proposed Draft Guidelines on the Labelling of Genetically Modified Foods and Food Products**

Federated Farmers of New Zealand (Inc) would like to acknowledge the submission made by NZ Food and Grocery Council (Inc), NZ Life Sciences Network and others. Federated Farmers agrees with many of the issues raised in these organisations' submission. Federated Farmers also supports the submission made by Meat & Wool New Zealand.

Federated Farmers recognises that many of the difficult issues raised by this guideline are due to the fact that many foods will fall in between the FSANZ Standards and the proposed Commerce Commission Guideline.

Federated Farmers is particularly concerned that the proposed Commerce Commission guideline encompasses manufacturing processes. While the science based FSANZ standard can be audited through scientific tests, the proposed "GM free" label includes production processes that may not have any impact on the final product. Consequently, it will not be possible in many cases to prove that a product does or does not meet the requirements associated with the GM label; neither should it be necessary if it does not affect the final product.

Many production processes, such as feeding GM food to an animal, do not genetically alter the animal in any way and are therefore not detectable in the end product. There is uncertainty whether this guideline will capture the extensive range of products produced using GM processes such as detergents used in the dairy shed, vaccines etc. Federated Farmers seeks further clarification in regard to production processes, which will be affected by this guideline.

Federated Farmers also has concerns in regard to the impact of this label on New Zealand's exports. Some markets may deliberately use the fact that a product does not meet the very high threshold of a "GM free" label in New Zealand to exclude that product. It is difficult to argue for a science based approach to market access, when labelling in the domestic market cannot be scientifically established.

Federated Farmers is concerned that the importance of science based regulatory regimes is not overlooked. Benchmarks that cannot be scientifically verified are not in the best interests of the consumer and risk creating further misunderstanding and confusion.

Yours sincerely

*Angela Brierley*

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