



# GE Free New Zealand

*In Food And Environment Inc.*

PO Box 13402, Wellington, NZ

20 February 2018

Re: Fol request 10 January 2018 FSANZ A1138 Provitamin Rice GR2E line

Dear Ms. Jordan,

Thank you for your note of costs put together by Dr Scott Crerar 8 February 2018.

## **Freedom of information request:**

1. GE Free NZ has requested the following documents under Fol laws:
  - The FSANZ report to the Australia and New Zealand Ministerial Forum on A1138;
  - All the notes; transcripts; written, electronic, voice and other documents; etc. that FSANZ possesses, which relate to the preparation and completion of the FSANZ assessment on A1138 – Provitamin Rice.
2. We hereby request a waiver of any fees under s.29 (4) of the FOI Act our Fol request on A1138 – Provitamin Rice GR2E as publication of the documents we seek is in the public interest. We believe that our request complies with the waiver guidelines at: <http://www.oaic.gov.au/freedom-of-information/applying-the-foi-act/foi-guidelines/part-4-charges-for-providing-access#correction>
3. We set out our reasons. As required by the conditions of the FOI Act s. 29(1)(f)(ii) and s. 29(5)(b)
4. We would like to draw your attention and acknowledge the high level of interest GM food has, in New Zealand and Australia. There is considerable community interest and involvement by the general public over all GM food approvals and decision processes. As you will be aware FSANZ receives many thousands of submissions on GM applications. Our members and the public at large are conscious and interested in the process of decision making that we believe outweighs any reason to withhold any information regarding A1138.
5. It is unfortunate that at this time it appears GE Free NZ and other NGO's did not receive notification regarding this application.
6. This information requested on the GM rice (A1138), which will be sold in Australasia, will promote accountability and transparency and will be able to

demonstrate how FSANZ makes food safety decisions, on behalf of all consumers, the public it serves.

7. A guarantee of food safety is very important for consumers, so all correspondence with the applicant, especially when there are no safety studies carried out, will allay any doubts to do with the regulatory approval process and safety of the food.
8. The FSANZ Act assures all consumers that the staff, experts and Ministers carry out an effective, accountable and transparent regulatory framework that provides adequate information relating to food so that consumers can have a high level of confidence in the choices they make when buying food.
9. The information requested is valuable for consumer and public confidence. Any withholding of this information is damaging to the spirit of a transparent FSANZ regulatory process of decision-making.
10. We totally agree to the redacting of all individual names to ensure protection, prejudice and privacy of individuals.
11. All the correspondence has been identified as 24 documents containing 137 pages, we are happy to have it all on a CD to save on printing costs.
12. Regarding the costs outlined in the reply correspondence (FOI GE Free NZ, 10.1.18) we are unable to meet the costs. We are a voluntary public interest, community NGO and request information on behalf of our members and the interested general public. We will gain no commercial or personal benefit, the reasons outlined are in the greater public interest and any costs will add to hardship, as we have no budget for FOI requests.
13. The grounds for this request are:
  - Genetic Modification (GM) of foods and labelling are matters of widespread and enduring public interest and discussion in all media modalities;
  - Genetic Modification of foods and labelling are of legitimate interest to shoppers, retailers and the general public: viz. adverse impacts; unintended effects; risks to human health and safety; content of GM foods; public and industry opinion.
  - The information will enable interested parties and the public to better understand the interface between FSANZ and applicant.
  - The applicant, GE Free NZ, is a not for profit Organisation of interested citizens which does not have the financial resources to pay fees.

Please provide the information requested in the FOI application, without charge.

Yours sincerely,

Claire Bleakley  
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Cc. Jon Muller  
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