

## submissions

---

**From:** [REDACTED]  
**Sent:** Thursday, 1 November 2012 11:53 PM  
**To:** submissions  
**Subject:** Submission against Application A1073  
**Attachments:** Application A1073 - SUBMISSION AGAINST - Ross Scholes NZ.pdf

**SUBMISSION AGAINST – Application A1073** made by Dow AgroSciences Australia Ltd and MS Technologies LLC **seeking permission for food derived from soybean line DAS-44406-6**

=====

This submission, <see attached> is made on behalf of the **NZ Peasants Association** with the full approval of the global peasant movement [La Via Campesina](#), the umbrella organisation representing more than 200 million smallholders and traditional farming families worldwide.

Ross Scholes (Auckland, NZ)

BSc; NatResMgt(PGDip); DevStud(PGDip);  
Ex-editor NZ Soil & Health magazine; Organic farmer.

[peasants.org.nz/](http://peasants.org.nz/)

**SUBMISSION AGAINST – Application A1073 made by Dow AgroSciences Australia Ltd and MS Technologies LLC seeking permission for food derived from soybean line DAS-44406-6**

=====

Whether raising children, dogs or crops the two basic approaches are either beating them into compliance, or nurturing them with care. In the short term the results from the first can seem equivalent or even superior in some aspects, but in the long-term the results always demonstrate its shortcomings - perhaps in seemingly unrelated ways. In farming those opposing mentalities characterise the approaches promoted as conventional (chemical) and organic (agroecology).

Farming more than any other activity interfaces with the processes of natural cycles; bounded by the interlocking feedback loops of multiple self-organising systems which together synthesise the steady state we call **sustainability**. Stressing the feedback of any part of the system challenges the resilience of the whole, forcing it to adjust into a new steady state ... over time. Over-stressing causes system extinction.

That is just how it is; the very nature of Nature itself, plain and simple. Those feedback adjustments define every natural or unnatural system; in the landscape, our bodies, even global financial systems. The context of this immutable but elastic, all-encompassing and self-evolving Nature is the proper context for considering the question of chemicalised agriculture in general, and the imposition of genetic mutations in particular, like those associated with this application.

It is a proven fact that chemically destabilising or masking natural systems to increase farmers' yields results in reduced productivity later on, often with delayed repercussions such as the cadmium build-up found in pasture lands now after repeated superphosphate applications. In balance the profit yields of organic management will do better those from chemical-based farming every time due to the extra resilience of a naturally healthier soil. Likewise healthier food also reduces personal and national healthcare costs, as was learned in the case of post-petroleum Cuba, an excellent example to consider. Another example is the exciting potential of SRI rice, developed by ADRA New Zealand (Adventist Development and Relief Agency) in Madagascar and now being used in Indonesia.

*"Using techniques taught in this video, farmers have been known to increase rice crop yields by an astounding 200-300%...but yet the techniques require no new technology or any heavy investment in machinery: <http://youtu.be/huifOQX6BkU>*

The best that can be said about chemical-based or so-called conventional farming - and that includes the use of glyphosate, and/or DDT and its toxic relatives like 2,4-D - is that it is wholly **unnecessary**. In reality it is an unsustainable use of land, a capital-driven model for factory farming geared towards big business, consumer control, international trade and monocultural practices. There are always healthier, less fuel dependent, more sustainable and more productive alternatives. However even those might be brought into doubt once the agrochemical giants are allowed to start tinkering with, and claiming ownership of, the ongoing process of the evolution of the gene ecologies (a new field called *epigenetics*) which are the common heritage of all life forms and underpins the entire living environment and the relationship between all organic processes on planet Earth.

*"A recent study demonstrated that plant small RNAs acquired orally through food intake directly influence **gene expression** in animals after migration through the plasma and delivery to specific organs." ~ Vaucheret and Chupeau: Cell Research (2012) 22:3–5.  
(<http://www.nature.com/cr/journal/v22/n1/full/cr2011164a.html>)*

Patented genes have turned up in traditional corn varieties in Mexico from transgenic corn crops planted in California, over 1000 miles away. In response to this and other instances the Supreme Court of India, a country which has suffered hugely from genetic engineering in different forms has recently put a total ban on open field trials of GMOs across the entire country.

*"The committee had scientists from the Centre for Cellular and Molecular Biology and the National Institute of Nutrition, and the decision has followed an extensive review process. [...] The recommendations are significant because the committee was peopled by scientists."* said Kavitha Kuruganti of the Coalition for a **GM-Free India**.

(<http://www.livemint.com/Politics/Z7slscyN6C4sCuqQmUPtEK/Court-panel-recommends-stopping-GM-crop-trials.html> )

North Indian farmers destroy Monsanto's GM corn field trials (<http://viacampesina.org/en/>)

About 40 years ago in New Zealand the use of 2-4-5-T and 2-4-D etc. became illegal in this country, and for good reasons. Its coming back into consideration is due to the increasingly obvious failure of the Roundup-Ready weed-control system. Nature's response has been to produce Roundup-resistant weeds.

Pesticide use ramping up as GMO crop technology backfires: study (Oct 2012)

<http://www.newsdaily.com/stories/bre89100x-us-usa-study-pesticides/>

Impacts of genetically engineered crops on pesticide use in the U.S. — the first sixteen years.

[Environmental Sciences Europe](http://www.enveurope.com/content/24/1/24/abstract) 2012. <http://www.enveurope.com/content/24/1/24/abstract>

### **Can we expect the same outcomes from using 2,4-D?**

It is already a given. Plus, the persistent toxicity that will be added to environment, and the health effects from direct and indirect ingestion of GM foods that were produced using these methods will bring gradual personal misery, national healthcare costs and intergenerational genetic distortions.

First-Ever Lifetime Feeding Study Finds Genetically Engineered Corn Causes Massive Tumours, Organ Damage, and Early Death (Sept 2012):

<http://articles.mercola.com/sites/articles/archive/2012/09/22/superbugs-destruct-food-supply.aspx>

The Health Hazards of GM Foods (Oct 2012):

<http://media.mercola.com/assets/pdf/articles/Peer-reviewed-studies-on-GM-food-health-risks.pdf>

### **Will GM help feed the world?**

The case against this argument is well presented by experts in these videos:

Farming Myths (2012) (<http://foodmyths.org/myths/hunger-food-security/>) [6min]

Genetic Roulette (2012) <http://youtu.be/wnlTYFKBg18> - [88mins]

GE may have provable future benefits to humankind but not in this form. **This is a failed technology:** the very existence of this application, and the hasty and secretive way it has been sought, is proof of that.

Ross Scholes.

BSc; NatResMgt(PGDip); DevStud(PGDip);

Father; Ex-editor NZ Soil & Health magazine; Organic farmer; NZ Peasants Association secretary.