

**Submission to Food Standards Australia New Zealand**  
**Application A1073 - Food derived from Herbicide-tolerant Soybean DAS-44406-6**

**PLEASE REJECT GM FOOD APPLICATION A1073 DAS-44406-6.**

FSANZ must NOT approve A1073 in the absence of studies that are relevant to public health. Side-effects must be assessed, especially in the diet of susceptible people, pregnant or breastfeeding mothers, babies, children, the elderly, and the sick. So please:

1. Ask the applicant for relevant, whole-of-life, multi-generational feeding studies.
2. Assess the results of transparent, independent feeding trials.
3. Postpone any further GM food approvals until food labelling laws are comprehensive and complete so that consumers are fully informed of GM-derived ingredients and traceability and recall are possible.

Application A1073 confirms the statement that **“The GM industry is racing to stay one chemical ahead of its self-inflicted injury, enmeshing farmers, consumers and scientists alike”**. It’s first one chemical, then two, and now three.

FSANZ has already approved for import into Australia as “food” around 50 GM varieties of 4 crops (corn, soy, cotton, canola) that tolerate one herbicide (typically glyphosate), two applications A1042 (GM corn with 2,4-D & quizalofop) and A1046 (GM soybean with 2,4-D & glufosinate ammonium) that tolerate two. Now with application A1073 we have a GM soybean with altered DNA genetically engineered to tolerate three chemicals 2,4-D, glufosinate ammonium and glyphosate.

GM crops might look like food, be marketed as food, but they are NOT food. GM crops are an incentivised PR promotion of a weed management option. GM crops are adopted by farmers with chemical addicted industrial farming practices and no qualms about being contract growers for chemical corporations. Like the cycle of drug abuse, GM crops create more problems than they solve and compound the cycle of chemical abuse. But worse! GM crops are not only agents of chemical pollution, they are agents of genetic pollution. Genetic pollution cannot be controlled, is self-propagating and unintended consequences are guaranteed.

The subject of this application A1073 is GM soybean for import from South America. But it is a product of human rights violations. Australia and New Zealand should not be party to the devastating health impact the GM soybean crops and chemical sprays are having on the growers and the community:

<https://www.youtube.com/watch?v=isBqWF3bOi4>

(just below the video where you see “Like”, click on the 6<sup>th</sup> little button “Interactive Transcript”, and select English)

Glyphosate resistant crops lead to glyphosate resistant weeds:

<http://www.abc.net.au/rural/regions/content/201211/3636640.htm>

Glyphosate resistant crop volunteers and glyphosate resistant weeds then need more, different, and more toxic chemicals such as Sprayseed and 2,4-D.

2,4-D resistant crops lead to 2,4-D resistant weeds:

<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3060243/>

So what chemical is next?

As Dr Don Huber says of Roundup Ready GM crops and glyphosate, "Why continue to abuse a system that we can see is already abused?":

<https://www.youtube.com/watch?NR=1&feature=endscreen&v=-nHCw36wlhs>

2,4-D and 2,4,5-T are the active ingredients in Agent Orange. You can hear from a scientist and lawyer in this video clip "The History of Agent Orange" how the chemical company "had the data first, then manipulated how they were going to look at that data to come up with the conclusion they wanted ... you absolutely NEVER do a study that way, NEVER, and they did it absolutely wrong":

<https://www.youtube.com/watch?NR=1&feature=endscreen&v=tznQ2Bko5X4>

So with application A1073, it is incumbent on FSANZ scientists to:

1. Analyse the applicant's data and experimental design.
2. Conduct feeding studies by reputable independent scientists that have no vested interest in the application.
3. Provide information on potential side-effects of ingestion so that consumers know what to look for.
4. Support full disclosure of GM-derived food so that consumers know the GM status of their food choices.

FSANZ, you MUST demand feeding studies and transparency. There is enough science out there and enough public health issues emerging to tell you that the precautionary principle MUST be applied when assessing genetically engineered products and that the ill-defined notion of substantial equivalence is an inappropriate yardstick. There is more than a decade or two of GM history for the public to assess. Public assessment is running contrary to FSANZ. Do not underestimate public intelligence. We are "A Clever Country". This is not a good look for FSANZ when laymen outstrip the Federal regulators!! For example ....

In September 2012 Seralini et al published the results of a long term feeding study on a GM corn NK603 genetically engineered to tolerate [absorb] the herbicide Roundup. FSANZ approved NK603 for import into Australia for use in our food 10 years ago based only on feeding studies of less than 3 months. Seralini et al observed the serious health effects emerging in the 4<sup>th</sup> month. The abstract of the peer-reviewed report states: "Females developed large mammary tumors almost always more often than and before controls, the pituitary was the second most disabled organ; the sex hormonal balance was modified by GMO and Roundup treatments."

Although the report was released at the time of Pink Ribbon Day and Breast Cancer Awareness Week, Australia's mainstream media withheld publication of the findings. Why? Does the public not have the right to know?

Thankyou FSANZ for doing a preliminary re-assessment available here:

<http://www.foodstandards.gov.au/consumerinformation/gmfoods/gmfactsheets/responsetosralinipap5676.cfmpublic>

However, you mention only that "The [European Food Safety Authority](#) and the German [Federal Institute for Risk Assessment](#) have also drawn similar conclusions."

**FSANZ, how could you reasonably arrive at your preliminary conclusions when we have the following stand-off on transparency?**

<http://www.reuters.com/article/2012/10/04/us-eu-gmo-monsanto-idUSBRE8930WL20121004>

*".....The safety watchdog [EFSA] said it would ask the authors to provide full details of the study's design and procedures, ahead of a final review due by the end of the month.*

*But the study's lead author, Gilles-Eric Seralini, said he would only make further information publicly available if EFSA published all the data from its 2003 safety assessment of NK603, which concluded that it was as safe as non-GM corn.*

*"To play fair they can't keep their data secret. The authorization of these products is based in our view on data and a methodology that are even more faulty," he said.*

<https://rt.com/news/corn-study-gm-french-711/>

*"It is absolutely scandalous that [the EFSA] keeps secret the information on which they based their evaluation [of NK603]," he said.*

*"In any event, we will not give them anything. We will put the information in the public domain when they do," Seralini said in an AFP report.*

**FSANZ, in addition, you have omitted informing the public of the following:**

1. **Russia's** consumer protection agency Rospotrebnadzor announced an immediate suspension on importation and use of the modified corn NK603 until the country gets further information on the safety of the products. Russian scientists are hoping to conduct their own rat experiment, set to begin in March 2013. They expect that their year-long experiment will show whether the controversial cultivation process has effects as dangerous as the French study claims. In an effort to conduct their study as publicly as possible, Russian researchers from the National Association for Genetic Safety (NAGS) came up with the idea of web cameras installed in cages with the test rats, which will broadcast all stages of the experiment online. The unique reality show will be available on the internet 24/7 worldwide. *"This is a unique experiment,"* project author Elena Sharoykina told RT. *"There hasn't been anything like it before – open, public research by opponents and supporters of GMO."*
2. **France's** Agriculture Minister Stephane Le Foll, Ecology Minister Delphine Batho and Health and Social Affairs Minister Marisol Touraine in a joint statement asked the French National Agency for Health Safety (ANSES) to investigate the finding. *"Depending on ANSES's opinion, the government will urge the European authorities to take all necessary measures to protect human and animal health,"* they said. *"The measures could go as far as invoking emergency suspension of imports of NK603 corn to Europe pending a re-examination of this product on the basis of enhanced assessment methods."*
3. **South Africa's** [African Centre for Biosafety](http://www.bloomberg.com/news/2012-09-28/monsanto-s-modified-corn-should-be-banned-in-s-africa-acb-says.html) called on the authorities to ban its cultivation, import and export. *"We urge the South African government to take the necessary steps to protect its citizens,"* the ACB said in a letter to the minister of agriculture, forestry and fisheries. The modified corn has been shown to cause tumors as well as liver and kidney damage in laboratory rats, it said. Ref: <http://www.bloomberg.com/news/2012-09-28/monsanto-s-modified-corn-should-be-banned-in-s-africa-acb-says.html>
4. **Canada's** regulators have not conducted any tests on NK603, or on any other GM food. In 2001, Health Canada approved Monsanto's GM NK603 for human consumption, based on a

data package submitted by Monsanto. This data is not accessible to the public or to the wider scientific community, so nobody knows or can comment with certainty on its contents. Health Canada did publish a 3-page summary of their 2001 decision and this makes no reference to a feeding trial, but "does refer to a gavaging study (typically a few days long), in which mice were force-fed a high dose of the single purified protein coded for by the modified Roundup Ready gene", i.e. it didn't involve the actual GM corn. As CBAN also note, the Royal Society of Canada's 2001 Expert Panel on the Future of Food Biotechnology found with regard to the data behind Health Canada's decisions to approve GM foods, "there is no means of independent evaluation of either the quality of the data or the statistical validity of the experimental design used to collect those data." Although the Royal Society's Expert Panel, set up at the request of the Canadian Government, made a series of recommendations for improving GM regulatory decision making, these have all been ignored. The failings of the Canadian regulatory system typify [GM regulation](#) worldwide. Ref:

<http://gmwatch.org/latest-listing/51-2012/14274-seralinis-research-exposes-major-regulatory-flaws>

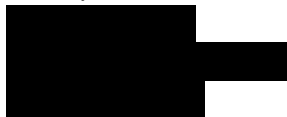
5. **India** .... ??? Monsanto repeatedly violates biosafety laws and norms, caught planting GM maize illegally: <http://indiagminfo.org/?p=360>
6. **China** .... ???
7. **Argentina, Mexico, Brazil, ....** ???

Our food regulators for Australia and New Zealand must do the job that they are legislated to do.

**PROTECT PUBLIC HEALTH SAFETY. REJECT APPLICATION A1073.**

With thanks,

Shirley Collins



Submission date: 6 December 2012