

## submissions

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**From:** jessica [REDACTED]  
**Sent:** Thursday, 6 December 2012 5:04 PM  
**To:** submissions  
**Subject:** A1073 GM soybean

Harrison  
[REDACTED]

### **Re : A1073 Genetically engineered Soybean DAS44406-6**

**I call on FSANZ to break with its history of GM approvals and refuse approval of herbicide-soaked A1073 GM soybean.**

**A1073 GM soybean must be proven safe using the results of whole-of-life, independent, multi-generational feeding studies BEFORE it is allowed into our food.**

- I am a concerned eater and mother of two. I have been aware of the risks of eating and growing GM food and crops since I lived in the UK from 1998 to 2003. I have done the utmost to avoid my family consuming GM food, especially when moving back here in 2003. Differences in the labelling between the UK and Australia show the deficiencies of the Australia labelling system. Here, the very products which are often GM are exempt from labelling. In the UK, all GM-derived products are labelled.
- The Approval document has a lack of scientific analysis and no detailed critique.  
A “rigorous” **reading** by FSANZ of DOW’s own safety data on genetically engineered Soybean DAS44406-6 does not inspire public confidence.  
Previously, FSANZ has dismissed studies published in peer-reviewed journals that demonstrate problems with GM foods.  
However, FSANZ accepts, without criticism, unpublished studies by GM companies as the basis for their approvals of GM derived foods.  
FSANZ regards it as “... the responsibility of companies that have developed GM foods to demonstrate the safety of that food and to supply FSANZ with the raw data from scientific studies to prove this.”  
Food Standards Australia New Zealand (updated 2012 Oct 4; cited 2012 Oct 6).  
[www.foodstandards.gov.au/consumerinformation/gmfoods/](http://www.foodstandards.gov.au/consumerinformation/gmfoods/)
- Genetically engineered Soybean DAS44406-6 is not likely to be labelled. As products derived from Soybean DAS44406-6 are usually refined when present in the food chain, these soy products are likely to fall neatly through the established FSANZ loopholes. Products derived from Soybean DAS44406-6 are deemed by FSANZ not to contain GM DNA, so they escape labelling. This will lead to a false assumption by the public that GM soy is not present in food including soy products. Genetically engineered Soybean DAS44406-6 is likely to be included, unlabelled, in baby formula, for example.

- GM soy is already a large component of animal feed, especially for poultry and pigs. It is not scientifically established that GM animal feed does not affect the meat and other products from GM-fed animals.

<http://www.gmwatch.org/latest-listing/49-2010/11841-are-animals-fed-gm-feed-different>

- FSANZ has duty to protect public health. As FSANZ is one of the first food authorities in the world to receive and assess this application, there needs to be a careful review of the scientific evidence in support of the application. We note that the Technical Expert Committee appointed by the Supreme Court in India has submitted a report setting down protocols for safety assessment of GMOs. This report follows the Cartagena and OECD guidelines and should set a base for all Food Authorities to be guided by. Two of eleven recommendations specify :
  - *2. Long-term and inter-generational studies in rodents to be added to the tests and performed for all products whether already approved or yet to be approved;*
  - *3. Acute and sub-chronic feeding studies for all applications including those in progress should be completed before BRLI as also molecular and allergenicity tests. If these studies indicate potential risks of any kind, the GM event should be rejected outright to save time.*

It is of great concern that in the rush to approve this transgenic soybean for commercialisation, environmental and ingestion studies have not been completed, the latter relevant for FSANZ's statutory responsibilities for food safety under Codex.

Interim report of the Technical Expert Committee, 17/10/2012, Supreme Court of India D.N.O. 1944/2005/Sc/PIL

- FSANZ anticipates approval in early May 2013 for Soybean DAS44406-6. This makes the public doubt the value submitting their legitimate concerns to FSANZ. The Auditor General's report notes :

- *3.36 These opportunities [for submissions] are notified via email alerts to stakeholders and also published on the FSANZ website. FSANZ states that these comments will be taken into account for the final assessments and they are also a mechanism to partly address the risk of varying stakeholder views. When advertising the opportunities for comment, FSANZ often states that it has found no reason to reject an application or that it intends to approve an application.*

Australian National Audit Office (ANAO). The Auditor General Audit Report No. 15 2010-11 Performance Audit, Food Standards Australia New Zealand, Commonwealth of Australia 2010. (cited 2012 Oct 6). Available from: [http://www.anao.gov.au/~media/Uploads/Documents/2010%202011\\_audit\\_report\\_no15.pdf](http://www.anao.gov.au/~media/Uploads/Documents/2010%202011_audit_report_no15.pdf)