

submissions

From: [REDACTED]
Sent: Tuesday, 10 February 2015 2:26 PM
To: submissions
Subject: SUBMISSION - Application A1097 Food derived from Herbicide-tolerant and Insect-protected Corn Line MON87411

Submission - Application A1097 Food derived from Herbicide-tolerant and Insect-protected Corn Line MON87411

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I do not give permission for my personal details to be released to persons under the Official Information Act 1982.

This submission is given in accordance with my rights under the New Zealand Bill of Rights Act 1990.

I do not wish to speak in support of this Submission.

STATEMENT: I DO NOT SUPPORT THIS APPLICATION. CORN LINE MON87411, AND ITS DERIVATIVES, MUST BE BANNED.

REASONS WHY FSANZ DOES NOT APPEAR TO BE FIT TO MAKE JUDGEMENT

- FSANZ bases its assessments on Codex Alimentarius (Codex), a food standard operated jointly by the United Nations FAO and WHO, and rigorously enforced on nations through the WTO under threat of imposed trade sanctions (this is highlighted in Section 2.3.2 of the Call for Submissions document). Well qualified expert observers have been stating for many years that Codex is the single biggest threat to world health and health freedom. The entire chain from UN to WTO has been fully captured by multinational corporations who masquerade behind a mask of public acceptability while manipulating Codex to their advantage. Codex is not about consumer protection but exists purely to promote trade, power and profit for multinational corporations. Codex is designed to protect the profits of big agra and big pharma by introducing patented GM foods and eliminating conventional foods, natural health products and treatments. By incrementally degrading foods and natural health products, or banning them altogether, Codex is 'weaponising' food to support illness not health. Chillingly, reputable observers state that the WHO, the co-sponsor of Codex, is dedicated to depopulation measures at unimaginable levels in support of UN Agenda 21. Codex, and the agencies that support it, do not appear to be entities that the public would knowingly want to embrace. In using Codex, it appears that FSANZ and its political controllers are not necessarily acting in the best interests of the public.
- If the above assertion is true, FSANZ does not aim to protect public health and safety and appears to have violated Sections 3 and 18 of the FSANZ Act.
- FSANZ has not presented anything new in the way of reputable independent sources of information. The studies and references cited also appear to be cherry-picked documents supporting this application. In failing to consider other independent reputable sources of information, FSANZ appears to have violated the statement in its submission document '*FSANZ is required to use the best scientific evidence available*' and also appears to have violated Sections 3 and 18 of the FSANZ Act.
- The US FDA maintains that Monsanto is responsible for safety testing of its products. Monsanto maintains that the FDA is responsible. FSANZ states that it is Monsanto's responsibility. Monsanto maintains that the regulator is

responsible. There seems to be a fundamental rift in which both FSANZ and Monsanto are absolving themselves of any responsibility, to the detriment of public health and safety.

- Sections 14 & 107 of the FSANZ Act state that FSANZ can acquire hold and dispose of personal property, can accept gifts grants bequests and advances, is not bound to act in a formal manner, is not bound by the rules of evidence, can inform itself on any matter in such manner as it thinks fit, is not obliged to receive written or oral information or submissions, can do anything incidental to any of its powers and can exercise these powers globally. The reader could perhaps be excused for thinking they were reading a fascist manifesto. These statements make a mockery of the rest of the Act where FSANZ's obligations and responsibilities are specifically defined, as would be expected of a high integrity authority acting in the public interest. Since FSANZ is seemingly not obliged to take any notice of independent expert opinion or public submissions and can seemingly do whatever it wants, its scientific credibility, and its ability to make sound decisions in the public interest, is effectively zero.
- Notwithstanding the above discussion on the FSANZ Act, as a corporate entity FSANZ appears to have no direct democratic accountability to the Australasian public and as such has no binding requirement to consider any submissions from the public whatsoever. It appears that the public submission process really is a sham.
- Further, if any of the government departments that are responsible for enforcing the Food Standards Code produced by FSANZ are themselves corporate entities, their rights of enforcement under corporate law may also be questionable.
- It is noted that the FSANZ Board contains a pecuniary interest in RNAi technology. Retaining this element in this assessment appears to be a conflict of interests and a breach of the Charter.
- It appears FSANZ and its political controllers are carrying out policies enforced by overseas agencies beyond the democratic reach of the public to implement Codex over which the public also does not have any democratic control. It appears that taxpayers' money is being used to promote foreign interests and support the biotech industry, which are not necessarily in the interests of the public, bypassing Australasians' sovereign rights in the process.

REASONS WHY MONSANTO IS NOT TRUSTWORTHY

- With something as vitally important as the introduction of new genetically modified substances into the food chain, Monsanto has consistently failed to follow good scientific principles. In addition to the technical information provided in its application, Monsanto must at the very least include full term testing on animals and suitable duration testing on humans and the environment with an independent peer review at all stages. The only testing Monsanto has submitted in support of its safety claims is a 90 day test on rats. Why only 90 days? Scientists say the OECD 90 day rodent test is totally inadequate. Wouldn't the claim have been considerably strengthened by taking the test to full term?
- The reason becomes abundantly clear with the published results of the first long term trial by Seralini in 2012. This peer reviewed trial is the most detailed and thorough study ever conducted on a GM food and its associated herbicide. The powerful pro-GMO lobby immediately mounted a vicious smear campaign and eventually forced a retraction of the study (which was then republished elsewhere). This study shows severe damage in rats including liver and kidney deterioration, immune system damage, blood anaemia and tumours. The first tumours only appeared 4 months into the study, one month after Monsanto's test ended. Damage was found in both the GM treated groups and the Roundup treated groups. See below for further details.
- Earlier, Seralini's team obtained the raw data for Monsanto's original 90 day trial by court order, and re-analysed it. They found signs of liver and kidney toxicity in the GM fed rats which Monsanto had not declared. Seralini published these findings in a peer reviewed journal in 2009.
- Monsanto does not allow independent testing of its GMOs as part of all licensing agreements and vigorously pursues and quashes anybody attempting to do so. Wouldn't independent testing strengthen Monsanto's claims? What does Monsanto have to hide?
- The approval of GMOs by the FDA has been established on the basis of 'Substantial Equivalence' to conventional foods. This is a meaningless scientific expression because it contains no specific reference points or boundaries and has never been proven true. Some idea of how such loose and fraudulent terminology could arise can be gained by looking at the revolving door between top executives at Monsanto and the FDA that has existed for many years and the obvious conflicts of interest presented.

- The idea of 'Substantial Equivalence' only applies when Monsanto is facing the public and approval authorities. For the purposes of gaining patents, Monsanto argues that GMOs are totally different to conventional foods.
- In addition to the 'Substantially Equivalent' term, GMOs are also said to be Generally Recognised as Safe (GRAS) although none has ever satisfied the strict criteria for this status.
- Monsanto promised that GMOs would make agriculture more sustainable, provide higher yields to alleviate hunger, reduce pesticide use, provide more nutritious foods, benefit the environment, reduce energy use and make farming easier and more profitable. All have demonstrably been proven false.
- GMOs are not about the public good, feeding the hungry, supporting farmers or providing consumer choice. It is about private corporate control of the food system. This control extends into areas that deeply affect people's wellbeing, food security, science integrity and democracy. It undermines the development of genuinely sustainable, environmentally friendly agriculture and prevents a transparent, healthy food supply for all. Officials and governments that continue to ignore the multifaced dangers of Monsanto GMOs are guilty of gross dereliction of duty.
- Analysts and whistleblowers state that the majority of applications to authorities such as the FDA are fraudulent and contain falsified data, blatant lies, misleading or deceptive information, unsubstantiated assumptions and omission of undesirable or negative data. This has been highlighted by subsequent disastrous failures in the market place, eg, Vioxx, which caused over 60,000 deaths, due to the manufacturer withholding vital safety information from the regulator. Monsanto has been caught out on numerous occasions submitting junk science to regulators.
- Polls show that over 70% of Americans do not want GMOs and over 90% want GMO food labelled (over 90% of processed foods in the US contain GMOs). Monsanto is spending millions to prevent mandatory labelling. This shows the enormous bullying power and deep pockets of Monsanto and other biotech corporations. What does Monsanto have to hide?
- In 2013 nearly 300 independent and eminent scientists from around the world issued a public warning that there was no scientific consensus about the safety of GMOs and that the risks, as demonstrated in independent research, gave serious cause for concern. It is not easy for these scientists to speak out. They have faced difficulties in publishing results in an industry controlled by big multinationals, have been systematically vilified by the pro-GMO machine and its deep pockets, have been denied research funding and have had jobs and careers threatened. The statement is here: <http://www.ensser.org/increasing-public-information/no-scientific-consensus-on-gmo-safety/>
- Where GM crops have pollinated non-GM crops on neighbouring farms, Monsanto with its deep pockets and corporate lawyers has sued recipient farmers for possession of patented GM material without a licence, ruining farmers and running them off the land.
- Monsanto has been found hiring online shills, who claim to be reputable scientists, to push the GMO agenda.
- Monsanto has been caught on numerous occasions bribing and corrupting officials both in the US and overseas and has been fined millions of dollars. It has even hired mercenary hit squads to spy on activists and protect its commercial interests by fear and force.
- Monsanto has been found guilty of false advertising and fined in both US and European courts.
- Monsanto is known to have hired ghostwriters to write fraudulent reports supporting GMOs.
- The Obama household and other elite families hypocritically only eat organic non-GMO food. Perhaps they know something that Monsanto is not divulging to the public.
- Monsanto has an interest in the Svalbard doomsday seed vault. You may care to ponder why. Experts agree it won't be for the benefit of mankind.
- Voters have consistently placed Monsanto into the top fliers, including first place, in the Corporate Hall of Shame. This ranks powerful corporations for political corruption, abuse of human rights and devastation of the environment.
- A list of Monsanto's reprehensible and corrupt behaviour in countries around the world would fill a book. It already has – 'The World According to Monsanto' by Marie-Monique Robin. The author was forced out of her job at a university for publishing the book.

- Monsanto has a GM corn containing an epicyte gene which causes irreversible sterilisation in humans. Why would a supposedly benevolent company like Monsanto have need of such a devastating weapon? Is this in support of the 90% depopulation plan of UN Agenda 21? Apparently this corn has been growing in the open for some years. With cross pollination being inevitable, the outlook for mankind is bleak to say the least.
- A recent 'Open Letter from America' aimed at the UK and Europe and signed by 1,700 eminent scientists, agricultural experts and community groups, details the unsatisfactory American experience with GMOs and outlines why GMOs should be kept out of agriculture and food systems. The letter speaks out about the corrupting influence of corporations over politics, regulation and science. This is yet another wake-up call for communities and governments everywhere. The letter is here: <http://www.theletterfromamerica.org/>
- The list goes on... Is Monsanto really the sort of corporate entity that you would want to trust with any aspect of your food?

REASONS WHY MONSANTO'S APPLICATION IS NOT SOUND

- The human body is an amazingly complex organism with new biological mechanisms and pathways constantly being discovered. Also, the genetic engineering process is imprecise and highly mutagenic, leading to unpredictable changes in the DNA, proteins, and biochemical composition of the resulting GM crop, which can result in unexpected toxic or allergenic effects and nutritional disturbances, as well as unpredictable effects on the environment. It would take a delusional organisation to state that this application fully addresses all aspects of health and safety and that there will be no detrimental effects from the introduction of MON87411 without comprehensive backup from long term animal and human trials accompanied by independent peer review at all stages. This has not been done. Terms such as 'Substantially Equivalent' and 'GRAS', as discussed above, are also scientifically invalid in this context. This Application, without the supporting animal and human trials and independent peer review, has no scientific credibility whatsoever and must be rejected.
- The first long term trial using a GMO was carried out by Seralini and his team in 2012 and received support from hundreds of independent reputable scientists from across the world. This peer reviewed trial is the most detailed and thorough study ever conducted on a GM food and its associated herbicide and is a true wakeup call for those still maintaining GMOs and their associated herbicides are harmless. This trial replicated the type of rat, corn and conditions used in the original Monsanto trial and shows severe damage in rats including liver and kidney deterioration, immune system damage, blood anaemia and tumours. The first tumours appeared 4 months into the study, one month after Monsanto's original test ended. Damage was found in both the GM treated groups and the Roundup treated groups. This damage was caused by a GMO and herbicide that Monsanto declared were safe. FSANZ has not presented any proof that similar damage will not occur with MON87411 and its associated herbicide. The Seralini publication is here: <http://www.enveurope.com/content/26/1/14>
- Other aspects of GMOs such as horizontal gene transfer and gene silencing have not been adequately addressed in this Application. Unlike Monsanto's dismissal of any risks, independent studies show that there are serious problems associated with these mechanisms.
- Does MON87411 contain the epicyte sterilisation gene described above? Has FSANZ carried out tests? Does any GM corn approved in the past contain it? Is any future corn or other food likely to have it? If it does, Monsanto is unlikely to tell anyone!
- Surveys show the majority of New Zealanders do not want GMOs. Not only are the GMO labelling laws totally inadequate but the lack of monitoring for GMOs in the market place makes consumer choice a farce. This is even more reason to reject MON87411.
- NZ would be wise to remember that international markets are sensitive to health and safety issues as can be seen from the recent botulism fiasco. Recently both China and Russia have banned GM imports. NZ is already importing a large quantity of GM grain which is going into animal feed without the knowledge of consumers or overseas markets. Overseas, GMO and Roundup residues have been found in meat and milk products and even other GMO by-products such as corn syrup. This contamination has the potential to cause NZ's primary products tremendous harm. NZ should be maintaining non-GM production to create a major point of difference and to meet the overseas demand for non-GM products. The government needs to preserve a clean green image, free of GMOs, otherwise economic suicide could result. MON87411 needs to be rejected.
- Roundup needs to be evaluated along with MON87411. The use of Roundup in pre-harvest drenching of conventional non-GMO crops is not a valid scientific argument for assuming Roundup has no health and safety issues, as FSANZ maintains. The Seralini study demonstrated that damage was caused by both GM corn and Roundup separately. Reputable studies in recent years have linked a host of increasing health problems with glyphosate including endocrine disruption, birth defects, Parkinson's, cancer, leaky gut, diabetes, aggression,

depression, obesity, Alzheimer's and MS. The trend has skyrocketed in South America and other areas of the world where Roundup is used on GMO crops. The situation is likely to get much worse as Roundup usage increases significantly every year to overcome increasing weed resistance. Top MIT scientist, Stephanie Seneff, is predicting that the increasing use of Roundup will cause half of all US newborns to be autistic by 2025. A growing number of countries around the world are banning Roundup. MON87411 and its associated herbicide, Roundup, should be banned in Australasia.

- Monsanto claims that Roundup is harmless to humans because it only inhibits the shikimate pathway in plants which it states is not present in humans. However, human gut bacteria do have this pathway and are killed by glyphosate. These bacteria are absolutely critical for good health. In addition, glyphosate inhibits CYP enzymes connected with the body's natural detoxification, interferes with serum sulphate transport, chelates critical minerals essential for health, depletes neurotransmitters serotonin and dopamine, breaks down phenylalanine releasing ammonia, disrupts the activation of vitamin D, interferes with the synthesis of bile acid, disrupts homeostasis of cholesterol, encourages overgrowth of pseudomonas aeruginosa releasing high levels of formaldehyde and other toxins, and encourages the growth of the serious bacterial infection clostridium difficile.
- Worse, the 'inert' adjuvants in Roundup amplify the effects of glyphosate, making Roundup about 125 times more toxic than glyphosate alone. One specific 'inert' chemical, POEA surfactant, is more deadly to human embryonic, placental and umbilical cells than the herbicide itself. Glyphosate breakdown product, AMPA, is also linked to a range of health problems. Long term animal research has found that the 'synergistic toxicity' of glyphosate based formulations showed toxicity at low levels that cannot be explained by glyphosate alone. Studies show that glyphosate stimulates tumour growth at the extremely low level of parts per trillion.
- Glyphosate is not only present at high levels in ground water samples but is also detectable in air and rain at levels that could have serious consequences for humans. In the US, glyphosate levels in breast milk have been measured at 760-1,600 times higher than levels permitted in European drinking water.
- Roundup is playing havoc with the environment. Not only is it producing resistant superweeds at an alarming rate, it is killing plants essential to insects, butterflies and poses a threat to bees. It is destroying the soil, killing beneficial organisms that keep the earth healthy and productive, impairing nitrogen fixation and also chelating essential plant nutrients.
- By cross pollination, GM crops have the potential to contaminate all standard and heritage crops. The only seeds left in this scenario will be patented GM seeds controlled by Monsanto and other biotech corporations. This will be a disaster for the health and safety of the public.
- It is claimed that millions of Americans have been eating GM foods in the United States without ill effects. But this is an anecdotal, scientifically untenable assertion, as no epidemiological studies to look at GM food effects have ever been conducted. GM foods are not labelled in the US, so there is no way of tracking their consumption and linking any suspected ill effects back to them. It is a case of don't look, don't find. Although American society is generally becoming less healthy, extrapolating from animal tests, it may be some years before the full adverse effects of GMOs become apparent.
- Conventional non-GMO plant breeding continues to outperform GMOs in producing high yield, drought tolerant and pest and disease resistant crops that can meet the world's present and future food needs. MON87411 is not needed or wanted.
- Society is largely built on the idea that science can provide high integrity solutions to keep us healthy, safe and prosperous. Science has now been hijacked and cheapened by corporations that pay scientists to produce phoney 'evidence based' results which conform to the needs of the corporate model. The public distrust of scientific studies, corporations and governments is growing rapidly. This Application is not sound and must be rejected. FSANZ and governments need to act swiftly to regain public confidence.
- FSANZ has failed to present a balanced discussion, has failed to acknowledge the abundance of evidence from reputable sources highlighting the dangers of GMOs and Roundup and has failed to make sound scientific judgement, to the detriment of public health and safety. In doing so, FSANZ appears to have violated at least Sections 3 and 18 of the FSANZ Act.

There is nothing in this Application that proves MON87411 is safe. By following the dictates of non-democratic overseas agencies and ignoring the health and safety dangers of GMOs and their associated herbicides, FSANZ has the potential to cause enormous damage to the public and government in years to come. FSANZ must ban MON87411.

Regards,