

Soil & Health Association of New Zealand

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SUBMISSION to: Food Standards Australia New Zealand,

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Re: Application A1046 - Food derived from herbicide-tolerant soybean line DAS-68416-4

Dear FSANZ,

The Soil & Health Association of NZ OPPOSES the Application and Assessment findings for Application A1046, and asks that the application be declined.

Soil & Health Association of NZ wishes to speak to this submission in New Zealand.

The Soil & Health Association of New Zealand Inc (Soil & Health) is 70 years old, and is the largest membership organisation supporting organic food and farming in New Zealand, and as such advocates for healthy and safe food and environmental sustainability.

Soil & Health has a membership of about 3000 members and a readership of its retail magazine publication *Organic NZ* of many thousands.

Soil and Health members and supporters prefer food without chemical residues, GE and nanotech components or contamination, and to this end are particular as to the food they purchase.

As part of the context for the submission, Soil & Health wishes to reflect to FSANZ some guiding statements as to the function of FSANZ.

The FSANZ mission statement is:

- *To protect, in collaboration with others, the health and safety of people in Australia and New Zealand through the maintenance of a safe food supply.*

FSANZ Values are:

To be impartial, open and accountable;

To use the best available sciences and evidence to guide decision-making;

To seek, respect and be responsive to the issues raised by others;

FSANZ Responsibilities are;

Provide information to consumers to enable better consumer choice

Undertake dietary exposure modeling and scientific risk assessments

Provide risk assessment advice on imported food

Soil & Health is concerned those values and responsibilities have not been met with the assessments to date for herbicide-tolerant soybean line DAS-68416-4

1. **Soil & Health** does not believe that FSANZ has considered adequate safety testing of the **herbicide-tolerant soybean line DAS-68416-4**. New evidence has shown that toxins from genetically engineered (GE) plants and herbicides associated with GE plants are able to pass from food into the blood stream of adults and also into foetal blood. (1) However food safety testing for this application has not been carried out using the actual food being applied for, or of the level of toxins expressed in actual field grown samples, or for an adequate period of time to determine effects both acute or chronic, including multigenerational animal feeding studies.
^[1] Aris A, Leblanc S. Maternal and fetal exposure to pesticides associated to genetically modified foods in Eastern Townships of Quebec, Canada. *Reprod Toxicol* (2011), doi:10.1016/.reprotox.2011.02.004
2. This GE soy is potentially dangerous to our consumer members. The application does not address food safety confidently to consumers. We are concerned about the range of negative metabolic, immune and digestive effects that might occur once soybean line DAS-68416-4 is eaten.
3. It is important that food safety research and data analysis for food derived from herbicide-tolerant soybean line DAS-68416-4 is obtained from credible independent institutions and individuals. Most of the assessment study results for this soybean line were derived from unpublished industry reports. The inherent conflict of interest and poor track record of large corporate agri-business companies for integrity of reporting makes the results less than adequate for consumer confidence.
4. The soybean line DAS-68416-4 contains novel genes that have never been considered by FSANZ before.
5. Safety assessment of the two herbicide interactions as well as the novel proteins inserted into these soy plants is required as in the final food available combination, as synergistic effects have been found with pesticides resulting in unexpected health effects. FSANZ will have access to such data.eg De La Rosa et al (2003, 2005)

6. Nutritional studies have not been carried out that reflect the actual GE line and resultant food products.
7. This assessment has been carried out with undue weighting towards trade, not the consumers health and safety. As copied here (6.2.1 Option 1), the considerations in rejecting the application include potential trade policy implications, limits on other soybean imports and WTO implications. Such weighting appears to have allowed other GE food lines to be permitted into the Australian and New Zealand food supply even though other international jurisdictions have not permitted the same lines.

“6.2.1 Option 1 – Reject Application

Consumers:

Possible restriction in the availability of imported soybean products to those products that do not contain soybean line DAS-68416-4.

No impact on consumers wishing to avoid GM foods, as food from soybean line DAS-68416-4 is not currently permitted in the food supply.

Potential increase in price of imported soybean foods due to requirement for segregation of soybean line DAS-68416-4.

Government:

Potential impact if considered inconsistent with WTO obligations but impact would be in terms of trade policy rather than in government revenue.

Industry:

Possible restriction on imports of soybean food products if soybean line DAS-68416-4 were to be commercialised overseas.

Potential longer-term impact - any successful WTO challenge has the potential to impact adversely on food industry.”

Soil & Health appeals to FSANZ to consider the health and safety of soybean line DAS-68416-4 as a food without the overlay of trade implications. This would better reflect the FSANZ mission statement, values and responsibilities as reflected at the beginning of this submission.

The Soil & Health Association asks that this application be declined, and submits that the application cannot be considered until full comprehensive and independent safety data on public health and safety can be provided.

Yours sincerely,

Steffan Browning

Spokesperson

Soil & Health Association of New Zealand

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