

**Submission to Food Standards Australia New Zealand**  
**Application A1094 - Food derived from Herbicide-tolerant Cotton DAS-81910-7'**

**PLEASE REJECT GM FOOD APPLICATION A1094 DAS-81910-7.**

FSANZ must NOT approve A1094 in the absence of independent studies that are relevant to public health of these 'Agent Orange' crops and in the absence of comprehensive labelling including that of oils and processed foods derived from genetically modified organisms (GMOs).

Before approval, 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 including toxicity testing.
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 A1094 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 we've already seen triple-stacked genes in application A1073.

GM crops are commodity crops for profiteering by chemical corporations. They are not food. They carry additional risks and no benefit to people. They are not healthful foods but designed purely to accommodate saturating in more and more toxic chemicals, promoting sickness not health. Chemical addiction of industrial GM crop production creates more problems than it solves being not only agents of chemical pollution, but also agents of genetic pollution. Once released to the environment, GMOs cannot be controlled nor recalled, they are self-propagating, and unintended consequences and contamination are inevitable.

The subject of this application A1094 is GM cotton for import, **a product of human rights violations** in the countries of origin and must also be rejected on those grounds. Australia and New Zealand should not be party to the devastating health impact the GM 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, Dicamba 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/>

What chemical next? FSANZ must do its job as a safety regulator and **stop the chemical treadmill**.

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 A1094, 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 and we can see the health problems emerging in ourselves and our families, and how we can reverse unwellness by moving to a non-GMO toxin-reduced diet. It is bordering on professional negligence for FSANZ to ignore the emerging evidence in the population of the adverse effects of GMOs.

**A petition was recently lodged in Federal Parliament calling for a Royal Commission into the use of pesticides. REJECT APPLICATION A1094 pending the outcome of this investigation.**

With thanks,

Shirley Collins



Submission date: 29 April 2014