

Seamons, Colleen

From: submissions
To: Leo Adler
Subject: RE: Submission on A1035 (MON 87701)

From: Leo Adler [mailto:]
Sent: Friday, 14 May 2010 6:59 AM
To: submissions
Subject: Submission on A1035 (MON 87701)

I Object to approval of:

Application A1035 - Food derived from Insect-protected Soybean Line MON 87701

I request FSANZ does NOT give these products approval because:

- 1. The release into the food chain will place unreasonable costs on my family and the many members of the community seeking to avoid GE ingredients.**
GM derived foods are INADEQUATELY labeled to provide consumers choice. The absence of labelling and declarations at restaurants and for food made at point of sale is unacceptable. There is a failure of justice in forcing consumers and others to carry risks of accidental consumption, and the additional costs incurred to avoid GE products.
- 2. The data on which the safety assessments have been based I recognized to be scientifically inadequate.**
Legal action in the US courts (ref 1) shows serious concerns about the inadequacy of data supplied by applicants and the assessment process itself. It is unreasonable to continue to consider and make approvals of GM foods on this basis. Scientists at the FDA have previously warned authorities not to assume safety under "GRAS" status. No further GM foods can be legitimately approved on such a basis.
- 3. NOT allowing these products into the human food chain can encourage industry to develop strict traceability, and proper safety testing.**
It is wrong to conclude there are no other measures that would be more cost-effective to support end benefits for safety and trade.

I call on FSANZ to change its decision and to NOT approve these product on the basis of an INADEQUATE process of assessment that exposes the public to unacceptable and unethical risk.

BACKGROUND ON GE FOOD APPROVALS

Source: APPLICATION A1029 - FOOD DERIVED FROM DROUGHT-TOLERANT CORN LINE MON87460 - 2nd ASSESSMENT REPORT

FSANZ has completed a comprehensive safety assessment of food derived from MON87460 corn, which was released in the 1st Assessment Report. This assessment included consideration of (i) the genetic modification to the plant; (ii) the potential toxicity and allergenicity of the novel proteins; and (iii) the composition of MON87460 corn compared that of conventional corn varieties.....On the basis of the available evidence, including detailed studies provided by the Applicant, food derived from drought-tolerant MON87460 corn is considered as safe and wholesome as food derived from other commercial corn varieties.

It is not correct that:

If approved, food derived from MON87460 corn will be required to be labelled as genetically modified if novel DNA and/or novel protein are present in the final food. Studies conducted by the Applicant show that novel proteins are present in the grain. Labelling addresses the objective set out in paragraph 18(1)(b) of the Food Standards Australia New Zealand Act 1991 (FSANZ Act); that is, the provision of adequate information relating to food to enable consumers to make informed choices. The general labeling requirements will provide consumers with information about the GM status of foods.

Reasons for Preferred Approach

The development of a draft variation to the Code to give approval to the sale and use of food derived from MON87460 corn MON 87701soy in Australia and New Zealand is proposed on the basis of the available scientific evidence, for the following reasons:

- the safety assessment did not identify any public health and safety concerns associated with the genetic modification used to produce MON87460 corn MON 87701 soy
- food derived from MON87460 corn MON 87701 soy is equivalent to food from the conventional counterpart and other commercially available corn varieties in terms of its safety for human consumption and nutritional adequacy
- labelling of certain foods derived from MON87460 corn MON 87701 soy will be required if novel DNA and/or protein is present in the final food
- a regulation impact assessment process has been undertaken that fulfils the requirement in Australia and New Zealand for an assessment of compliance costs. The assessment concluded that the preferred option is Option 2, an amendment to the Code
- there are no relevant New Zealand standards
- there are no other measures that would be more cost-effective than a variation to Standard 1.5.2 that could achieve the same end.

PUBLICATIONS ON GM FOOD SAFETY

<http://www.news24.com/MyNews24/YourStory/GM-foods-Selective-quoting-20100401>

The same Royal Society states in a 2002 submission to the UK government the following:

"...it is possible that GM technology could lead to unpredicted harmful changes in the nutritional status of foods."

Lombard further supports his argument with a statement from the British Medical Association (BMA), but fails to raise BMA concerns (see BMA 2004 report, "Genetically-modified foods and health: a second interim statement")

"There is environment ... safety concerns cannot, as yet, be dismissed completely on the basis of information currently available." (BMA 2004 Report)

By citing the EU report in support, Lombard again falls short of truthful reporting, since EU environment minister Stravos Dimas's opposition to the approval for cultivation in the EU of two GM varieties of maize, Bt-11 and 1507, confirms (October 2007):

"... possible long-term risks to the environment and biodiversity are not completely known, and environmental effects resulting from the cultivation of the GM maize lines are unacceptable." says Dimas.

Lombard writes, "Further negative, fear mongering, unsubstantiated claims by Hassan which are absolute rubbish I will indicate in italics, and respond with factual data."

"No scientifically proven substantiated 'safety risks' of GMO's has ever been published and peer reviewed. I challenge Hassan to produce the evidence." This is a blatant lie.

"I refer you to my "Special Report" (see above) and French Prof Seralini's 2009 publication[1], where he presents clear evidence of hepatorenal toxicity (liver + kidney, for those who don't understand scientific jargon) on mammalian tissue upon ingestion of three Monsanto corn varieties.

Need I refer Mr Lombard to the famous 1999 Arpad Pusztai study[2], published in the Lancet, for which he was denigrated and eventually vindicated, when he shocked the world reporting on the negative health effects on rats fed Monsanto's GM potatoes.

A 2004 study led by Italian Prof Marco Biggiogera, found consistent damage to the testis of rats fed Monsanto GM soy[3].

Author, GM activist and peer-reviewed scientist (note Mr Lombard), Jeffrey Smith lists some 150 negative impacts on health and the environment in his 2007 publication, "Genetic Roulette: The Documented Health Risks of Genetically-engineered foods" [4].

1. de Vendômois J.S., Roullier F., Cellier D., Séralini G.E. A Comparison of the Effects of Three GM Corn Varieties on Mammalian Health. *Int J Biol Sci*, 2009; 5:706-726. Available from <http://www.biolsci.org/v05p0706.htm>
2. Stanley W B Ewen, Arpad Pusztai. "Effect of diets containing genetically modified potatoes expressing *Galanthus nivalis* lectin on rat small intestine". *THE LANCET*; Vol 354, October 16, 1999.
3. B. Cisterna, M. Malatesta, T.E. Martin, M. Biggiogera. "Ultrastructural analysis of testes from mice fed on genetically-modified soybean". *L. Vecchio, European Journal of Histochemistry*, 2004; vol. 48 issue 4 (Oct-Dec):449-454
4. Jeffrey M. Smith. "Genetic Roulette: The Documented Health Risks of Genetically-engineered foods", Yes! Books. 2007

Thank you for your consideration and time,
Leo Adler