

Seamons, Colleen

From: submissions
Subject: FW: Submission on A1029(GM Corn MON87460) and A1035 (GM Soy MON 87701)

From: j c [mailto:]
Sent: Tuesday, 4 May 2010 7:33 AM
To: submissions
Subject: Submission on A1029(GM Corn MON87460) and A1035 (GM Soy MON 87701)

Submission on A1035

Submitter: Mr J Carapiet
[REDACTED]
[REDACTED]

I Object to approval of:

Application A1029 – Food derived from Drought-tolerant Corn Line MON87460 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. The costs to millions of consumers of having to buy different products, travel to shops that sell GM-free foods, and for manufacturers to keep these ingredients out of the human food chain necessitate that their applications be REFUSED

Contrary to the claims made in the reports issued by FSANZ - GM derived foods are NOT ADEQUATELY labelled 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 is recognized to be scientifically inadequate. FSANZ have a legal duty and moral responsibility to halt approvals based on inadequate data and flawed assessment systems.

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.

Mr J Carapiet

Reference 1)

http://www.nzherald.co.nz/world/news/article.cfm?c_id=2&objectid=10641218&ref=emailfriend

Biotech row heads to top US court

NZ Herald

4:00 AM Wednesday Apr 28, 2010

Fourteen years after commercialisation of the world's first biotech crop, United States regulatory agencies charged with overseeing biotech crops are under attack.

The US Department of Agriculture is most directly in the line of fire after a string of federal court decisions found its officials acted illegally or carelessly in approving some biotech crops.

But the Environmental Protection Agency and the US Food and Drug Administration also face criticism.

In one recent case, a federal court banned the sale of a herbicide-tolerant alfalfa engineered by Monsanto until the government more thoroughly evaluates its safety.

US District Court Judge Charles Breyer ruled that the USDA violated federal law in allowing unrestricted commercial planting of "Roundup Ready" alfalfa - a key livestock fodder - without a solid review.

Breyer ordered the USDA to prepare an environmental impact statement that explores potential negative consequences that critics say could include contamination of non-GMO alfalfa fields.

The spread of herbicide-tolerant weeds is also a concern and is a mounting problem that has been reported in many key farming areas.

Monsanto has appealed the ruling and the US Supreme Court will hear the case this week, marking the first time the high court has taken up biotech crop concerns.

In a similar case, a federal court found that sugarbeets altered to be "Roundup Ready" were approved without adequate USDA evaluation.

US District Court Judge Jeffrey White said the government's decision to deregulate Roundup Ready sugar beets "may significantly affect the environment" and he encouraged growers to "take all efforts, going forward, to use conventional seed".

Judge White declined to immediately ban all GMO sugarbeet plantings, but said he would consider a permanent injunction at a hearing on July 9.

Andrew Kimbrell, executive director of the Centre for Food Safety, which filed the sugarbeet lawsuit, said the court actions should be a "wakeup call" for the US government.

"They will not be allowed to ignore the biological pollution and economic impacts of gene-altered crops," he said. "The courts have made it clear that USDA's job is to protect America's farmers and consumers, not the interests of Monsanto."

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Comments

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

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. **Page 2**

I Disagree with the claimed 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 87701soy** corn
- food derived from **MON87460 corn MON 87701soy** 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 87701soy** corn 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.

I demand FSANZ respond to evidence of potential harm and revise the inadequate assessment system to properly protect public health and the integrity of the food chain. See below:

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."

writes Lombard. "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