

**From:** standards.management@foodstandards.gov.au  
**Sent:** Tuesday, 19 April 2011 5:01 PM  
**To:** standards.management  
**Subject:** FSANZ: Applications and Submissions - Submission [SEC=INCONFIDENCE]  
**Attachments:** GMcornA1042.docx



**FSANZ: Applications and Submissions - Submission**

Tuesday, 19 April, 2011

- 1. Assessment Report Number:** A1042
- 2. Assessment Report Title:** Application A1042 Food Derived from herbicide tolerant corn line DAS-40278-9
- 3. Organisation Name:** MADGE Australia Inc
- 4. Organisation Type:** Consumer Group
- 5. Representing:** Mothers and others - anyone who eats
- 6. Street Address:** N/A
- 7. Postal Address:** PO Box 10 287 Brunswick St Fitzroy Vic 3065
- 8. Contact Person:** Fran Murrell
- 9. Phone:** 0401 407 944
- 10. Fax:** n/a
- 11. Email Address:** [info@madge.org.au](mailto:info@madge.org.au)
- 12. Submission Text:** Submission on Application A1042 Food Derived from herbicide tolerant corn line DAS-40278-9 MADGE requests that FSANZ rejects this application. MADGE is a voluntary group and has limited resources to comment on applications within the timeframe allowed. We have numerous objections to this application which we would be happy to present and discuss with you but the written submission is limited to the following points: 1) This crop has been designed to survive being sprayed with the weedkiller 2-4-D. The experience of previous herbicide tolerant GM crops show that this will both increase the use of 2-4-D as well as lead to weed resistance making the technology obsolete quickly. 2) There are already weeds resistant to 2-4-D and there are grave concerns that use of this chemical will be detrimental to those who use it and to the general public and environment. 3) 2-4-D was an ingredient in Agent Orange. Although 2-4-D has been in use for decades there are alarming gaps in knowledge about its affects on human health. Although authorities have been reluctant to declare it a carcinogen it was found to have caused the death by cancer of a forestry worker. It is also found to cause abnormal foetal skeletal development, increased foetal mortality and is an endocrine disruptor causing significant chromosomal damage in human cells. 4) The acute toxicity trial done on 10 mice resulted in one mouse having signs of a stomach ulcer and another with a dark patch on her brain. The mice were given two doses of a GM protein one hour apart and observed for two weeks. This is entirely inappropriate to determine whether this GM corn is fit to eat. It is disappointing that FSANZ did not request any further tests. 5) MADGE requests that the full data be available to the public. Currently we would have to

purchase the information at a cost of about \$190. This restricts the ability of interested members of the public and independent scientists to investigate the way GM foods are being created and approved. Thank you for the opportunity to request that this GM corn be banned from the Australian food supply. Yours Sincerely Fran Murrell On Behalf of MADGE Australia Inc, [www.madge.org.au](http://www.madge.org.au) [http://www.organic-center.org/science.pest.php?action=view&report\\_id=159](http://www.organic-center.org/science.pest.php?action=view&report_id=159) <http://www.gmwatch.eu/latest-listing/1-news-items/12888-re-gm-industry-solution-to-glyphosate-resistant-weeds-2-4-d-resistant-crops> <http://www.pan-uk.org/pestnews/Actives/24d.htm> <http://www.madge.org.au/Docs/MR-110317-serious-alert-about-FSANZ.pdf>

# Submission on Application A1042 Food Derived from herbicide tolerant corn line DAS-40278-9

MADGE requests that FSANZ rejects this application.

MADGE is a voluntary group and has limited resources to comment on applications within the timeframe allowed. We have numerous objections to this application which we would be happy to present and discuss with you but the written submission is limited to the following points:

- 1) This crop has been designed to survive being sprayed with the weedkiller 2-4-D. The experience of previous herbicide tolerant GM crops show that this will both increase the use of 2-4-D as well as lead to weed resistance making the technology obsolete quickly.<sup>i</sup>
- 2) There are already weeds resistant to 2-4-D and there are grave concerns that use of this chemical will be detrimental to those who use it and to the general public and environment.<sup>ii</sup>
- 3) 2-4-D was an ingredient in Agent Orange. Although 2-4-D has been in use for decades there are alarming gaps in knowledge about its effects on human health. Although authorities have been reluctant to declare it a carcinogen it was found to have caused the death by cancer of a forestry worker. It is also found to cause abnormal foetal skeletal development, increased foetal mortality and is an endocrine disruptor causing significant chromosomal damage in human cells.<sup>iii</sup>
- 4) The acute toxicity trial done on 10 mice resulted in one mouse having signs of a stomach ulcer and another with a dark patch on her brain.<sup>iv</sup> The mice were given two doses of a GM protein one hour apart and observed for two weeks. This is entirely inappropriate to determine whether this GM corn is fit to eat. It is disappointing that FSANZ did not request any further tests.
- 5) MADGE requests that the full data be available to the public. Currently we would have to purchase the information at a cost of about \$190. This restricts the ability of interested members of the public and independent scientists to investigate the way GM foods are being created and approved.

Thank you for the opportunity to request that this GM corn be banned from the Australian food supply.

Yours Sincerely

Fran Murrell

On Behalf of MADGE Australia Inc, [www.madge.org.au](http://www.madge.org.au)

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<sup>i</sup> [http://www.organic-center.org/science.pest.php?action=view&report\\_id=159](http://www.organic-center.org/science.pest.php?action=view&report_id=159)

<sup>ii</sup> <http://www.gmwatch.eu/latest-listing/1-news-items/12888-re-gm-industry-solution-to-glyphosate-resistant-weeds-2-4-d-resistant-crops>

<sup>iii</sup> <http://www.pan-uk.org/pestnews/Actives/24d.htm>

<sup>iv</sup> <http://www.madge.org.au/Docs/MR-110317-serious-alert-about-FSANZ.pdf>