

Seamons, Colleen

From: Phyllis Tichinin [PETichinin@slingshot.co.nz]
Sent: Tuesday, 19 April 2011 6:27 AM
To: submissions
Cc: phyllis@abron.co.nz
Subject: Application A1042

Categories: Green Category

Phyllis Tichinin
PO Box 8055 Havelock North, NZ
64 6 874 7897
19 April 2011

Re: Application A1042 – Food derived from herbicide-tolerant Corn line DAS-50278-9

Dear FSANZ,

Given the FSANZ responsibility to protect the health and safety of the people of New Zealand and Australia through a safe food supply, I would consider the approval of the application A1042 to apply 2,4 D to the DAS-50278-9 corn line to be a breach of your duty of care.

Approval of a line of genetically modified stable food with the express purpose of facilitating the routine application of a herbicide that has proven to have serious negative health impacts is contrary to your mandate and leaves you open to legal challenge, and the consumer open to poisoning.

The era of regulatory agencies skating across the surface of data clearly indicating synergistic, cumulative deleterious impacts from pesticides (especially herbicides) is over. Large scale and intensive clinical and epidemiological studies over the last 30 years have clearly indicated that there is firm link between pesticide exposures and Parkinson's, Non-Hodgkin's Lymphoma, learning disabilities, skin disorders, liver cancer and neurotoxic disorders (the Ontario Canada Doctors' study provides ample evidence and additional references).

Allowing the use of a powerful and health discredited herbicide like 2, 4 D on corn crops is breach of your mandate to maintain a healthy food supply. This is particularly poignant in the case of a stable like corn that appears in some form in most processed foods, which today constitute the bulk of most people's diet.

The dietary exposure modelling the agency uses is inadequate and will provide inaccurate appraisal of the potential health impacts of the increased dietary exposure to 2, 4 D. There is insufficient model acknowledgement of the cumulative, age-dependent and synergistic impacts of herbicide exposure.

This is a sad artefact from the early days of US EPA regulation of pesticides when pesticides were approved solely on LD 50 values and the erroneous assumption that pesticides effects in organisms do not combine and synergise. That assumption has been disproven by numerous in vitro studies but it's legacy lingers within the regulatory framework. Understandably, it is quite taxing to try to model the complexities of multiple, synergistic exposure, but that is no reason to assume pesticide exposure is minimal and safe. On the contrary, given the poor and declining state of general health as pesticide use increases per hectare of crop, those of a scientific bend need to assume that there is likely to be a causative link between the two. Approving this application is a clear breach of science standards and the agency mandate because of the inadequate safety evaluation.

The fact that the application is for a line of corn resistant to herbicide 2,4 D instead of to a less toxic glyphosate based product, indicates that weed resistance to glyphosate has become a problem where RR corn has been grown. This phenomena of 'Super Weed' resistance to glyphosate spawned by widespread use of RR corn in the USA is now reaching critical proportions there along with an dramatic increase in corn plant diseases and attendant loses. Productivity and profitability of genetically modified corn and soy beans rapidly declining within 3 years of introduction and the evidence of adverse environmental and human health is mounting. (See the work of Prof. D. Huber, Emeritus. Purdue University and Dr. R. Kramer on human health impacts). What you are being asked to approve is the beginning of the slippery slope towards greater use of more toxic agricultural chemicals in pursuit of illusory gains in productivity.

The approval of a genetically modified line of crop destined for human or animal food consumption is fool hardy and in direct contravention of the agency's mandate to safeguard health and a safe food supply. The original 1990's USDA designation of genetically engineered food as 'substantially equivalent' was an unconscionable act that was opposed by the agency's scientists. FSANZ ought to have enough science nous and guts to see through the sham of that designation. Various in vivo trials from Australian to Moscow are documenting reproductive failure, hormone disruption, growth abnormalities and organ damage in animals fed genetically modified soy, corn or potatoes. There is no longer any doubt that genetically modified food is not the same as conventional food and a serious appraisal of all existing and in process animal trials needs to be undertaken by FSANZ and made public before contemplating approval of this application.

Rejection of the application will NOT lead to reduced food availability or abrogation of NZ and Australian's moral responsibility to help feed the world's growing population. Forms of agricultural management that produce a greater yield of a higher nutrient quality crop on fewer agricultural chemicals are already be used on millions of hectares in both countries. Known as eco-agriculture or biological farming, the approach utilises complex carbon sources to buffer and reduce the amount of fertiliser used. It more fully remineralises soils and boosts beneficial soil microbe diversity. This results in greater humus formation, less water use, more nutrient dense and healthier plants that do not require as much chemical intervention to reach harvest. These are options available to farmers of both countries and they are being rapidly taken up to our mutual market advantage in being able to export highest quality produce to lucrative markets. Biological farming can markedly contribute to better national environmental and human health.

There are multiple, strongly science-based reasons to reject this application. It is the thin edge of a very harmful wedge that would threaten our general wellbeing. The sad losses now occurring in the agricultural heartland of the Mid-Western USA from the adoption of GMO crops there can be a salutary warning to NZ and Australia. Please explore what has happened there before you bring down the same disaster on our heads.

Encouragingly,

Phyllis Tichinin

Phyllis Tichinin

Havelock North

06 874 7897

