

## submissions

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**From:** Alan and Elaine [REDACTED]  
**Sent:** Thursday, 29 November 2012 10:51 AM  
**To:** submissions  
**Subject:** Re: Application A1073 - Food derived from herbicide-tolerant soybean line DAS-44406-6

Food Standards Australia New Zealand [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

Re: Application A1073 - Food derived from herbicide-tolerant soybean line DAS-44406-6

Dear FSANZ,

We ask that FSANZ withdraw the application A1073 until the requisite safety tests have been conducted. As a consumer, we are highly concerned that you have been misleading in saying that you have fully assessed, along the best scientific grounds, the safety of this food. We now know that there are no feeding studies conducted on the soybean or any components of the whole food. Without this information there is no way that FSANZ can carry out its risk assessment on A1073.

We note that Food Standards Australia New Zealand (FSANZ) values and responsibilities are to protect, the health and safety of people in Australia and New Zealand through the maintenance of a safe food supply using the best available sciences and evidence to guide decision making and being responsive to the issues raised by others, to enable better consumer choice by undertaking dietary exposure modeling and scientific risk assessments on GM foods. Based on a reading of the assessments on A1073 that are provided on your website, we believe that you have fallen short of your duty of care in relation to this application. The soybean line contains novel genes that have never been considered by FSANZ.

- FSANZ has not followed its legislated, Codex or OECD guidelines for risk assessment over significant changes of nutrient, protein, carbohydrates and anti nutrients in A1073.
- Applicant information provided on safety is insufficient for assessment & approval into the food chain.
- There have been no feeding studies to show if there is risk from novel DNA or pesticides applied to the whole soybean, A1073 (DAS 44406-6 event).
- There is a lack of scientific data necessary to protect and maintain a safe food supply for the health and safety of people in Australia and New Zealand.
- The reliance on the applicant's data has not shown impartiality, openness and accountability.
- FSANZ has not provided information to consumers that will enable better consumer choice.

GM crops have been touted as being able to 'feed the world' with better yields, but in practice the opposite has happened, with herbicide resistant superweeds and pesticide resistant superbugs wreaking havoc on crop production. These GM organisms also contaminate other non-GM plants, threatening the survival of heritage species and eco-systems.

Over the last year there have been some highly concerning studies published in relation to safety - Seralini. G-E., Clair. E., Mesnage. R., Gress. S., Defarge. N., Malatesta. M., Hennequin. D. and de Vendomois. JS. (2012) Long term toxicity of a Roundup herbicide and a Roundup-tolerant genetically modified maize. Food and Chemical Toxicity Vol: 50, (11) 4221–4231) that highlight the potential of real danger from A1073 components.

Lastly, we would like to reiterate the fact that we believe that approving this application, without independent safety information, would be a breach of your "duty of care". A copy of this submission will

therefore be preserved in our own files to ensure that any post approval investigations can verify that precautionary principles were recommended.

Yours sincerely,  
Alan & Elaine Bainbridge

