

MAGSASAKA AT SIYENTIPIKO PARA SA PAG-UNLAD NG AGRIKULTURA

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September 14, 2017

MS ROBYN KRUK

CHAIRPERSON

BOARD OF TRUSTEES

FOOD STANDARDS AUSTRALIA NEW ZEALAND

Boeing House 55 Blackall Street BARTON ACT 2600 AUSTRALIA

Cc: Mark Booth, Chief Executive Officer, FSANZ

Subject: Comment on Application A1138 (Food derived from Provitamin A Rice Line GR2E)

Dear Ms Kruk,

Warmest Greetings from the Philippines!

We, the Magsasaka at Siyentipiko para sa Pag-unlad ng Agrikultura or MASIPAG is a farmer-led network of people's organizations, non-government organizations and scientists working towards farmers empowerment through farmers' control and sustainable use of genetic and biological resources, agricultural production and associated knowledge.

We are writing you regarding our concern about IRRI seeking approval of Golden Rice in Australia and New Zealand (Application A1138). In the Philippines, the Golden Rice project is also underway wherein IRRI and local rice research PhilRice are also seeking application for Golden Rice Field Tests and Direct Use as Food, Feed and Other Purposes with the intent to make it commercially available to Filipino farmers and consumers.

As a network forwarding the respect of farmers rights to seeds and the protection of the people's right to health and to a balanced and healthful ecology, we see that this application if granted would circumvent democratic processes under Philippine regulatory systems on GM crops, deny our government its duty to establish its own capacity in regulating GM crops, facilitate feeding trials of Golden Rice among the Filipino people and fast-track the commercialization of the said crop in our country.

MASIPAG is a nation-wide network with the following regional offices:

MASIPAG-Luzon
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To share with you, a lot of issues are hounding Golden Rice which is being raised by Filipino farmers and consumers. Recently, the National Anti-Poverty Commission (NAPC), a government agency whose mandate is to address issues concerning poverty alleviation, has also expressed concern about the said project being rice as a staple food of our countrymen. Last August 11, 2017 an Inter-agency and Stakeholders' Dialogue on Golden Rice was held and attended by Golden Rice proponent Philrice and other government agencies such as the National Nutrition Council, Food and Nutrition Research Institute, Bureau of Plant Industry of the Department of Agriculture among others.

The dialogue was spearheaded by NAPC along with various civil society sectors in line with its institutional mandate to ensure meaningful public participation on various government policies. We are thus submitting to your office a summary of the observations, comments and reactions by Civil Society Organizations (CSO) present during the said dialogue. This summary was lifted from the minutes of the meeting.

- (a) Lack of genuine public participation, transparency and access to information.
- (b) The creation of a new regulatory policy on GMOs, the Joint Department Circular No 1 of 2016, stressed that all Departments (DA, DOH, DOST, DILG and the DENR) should have their own separate risk assessments and evaluations with public information, participation and commenting components. However, there is absence of risk assessment procedures, guidelines or administrative orders of all of the Departments who are party under the Joint Department Circular No. 1 of 2016 while the application for field trial and direct use of Golden Rice/GR2E is ongoing.
- (c) Most of the answers to the questions raised to determine socio-economic, cultural and ethical considerations in the application for field testing and direct use of Golden Rice are 'not applicable' and were not addressed by the proponents.
- (d) There were no comparative studies of Golden Rice vis-a-vis presence of natural, local food sources of Vitamin A and government interventions (food fortification, supplementation programs) to lessen Vitamin A deficiency in the country. Vitamin A deficiency declined drastically from 40.1% in 2003 to 15.2% in 2008 without Golden Rice commercialization.
- (e) Lack of participation in the drafting of risk assessment guidelines, check and balance procedures, scientific and transparent studies to ascertain safety of Golden Rice to human health and the environment.
- (f) Safeguard and accountability mechanisms and regulatory capacities of pertinent government agencies and the proponents to mitigate and address potential social, health and environmental risks including GMO contamination of traditional varieties and adverse health effects are currently undefined and/or inadequate.

Likewise, we are also attaching a House Resolution Number 1294 **DIRECTING THE COMMITTEE ON AGRICULTURE AND FOOD TO CONDUCT AN INQUIRY, IN AID OF LEGISLATION, ON THE DEVELOPMENT OF GOLDEN RICE OR VITAMIN A RICE, A GENETICALLY ENGINEERED RICE, IN ORDER TO DETERMINE ITS IMPACT ON HEALTH, ENVIRONMENT AND FARMERS' RIGHTS.**

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In sum, a lot of issues need to be discussed with regards to Golden Rice application, the country's GM regulatory system and the implications of GM crops to the lives and livelihood of the Filipino people. It is because of the aforementioned circumstances that we are calling on FSANZ to at least give the Philippines leeway for it to resolve the numerous problems that the farmers and consumers are raising.

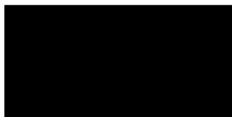
While we respect FSANZ is only acting on the request of Golden Rice proponents to have their product assessed for safety, we pray that FSANZ is discerning enough not to be used by huge agrochemical companies and corporate scientists in their desire to extract more profit from small and resource-poor farmers in the Philippines

It is our hope that FSANZ would deny the said application and give the Philippines and its farmers chance to find viable, safe and sustainable solutions on food security, hunger and malnutrition.

For the farmers,



Cristino Panerio
National Coordinator
Magsasaka at Siyentipiko para sa Pag-Unlad ng Agrikultura (MASIPAG)



Pepito Babasa
Farmer-Breeder and Chairperson
Board of Trustees
Magsasaka at Siyentipiko para sa Pag-Unlad ng Agrikultura (MASIPAG)

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Republic of the Philippines

HOUSE OF REPRESENTATIVES

Quezon City

SEVENTEENTH CONGRESS

Second Regular Session

HOUSE RESOLUTION NO. 1294

INTRODUCED BY REPRESENTATIVES

ARIEL B. CASILAO

**CARLOS ISAGANI T. ZARATE, EMMI A. DE JESUS, ANTONIO L. TINIO,
ARLENE D. BROSAS, FRANCE L. CASTRO, AND SARAH JANE I. ELAGO**

RESOLUTION

**DIRECTING THE COMMITTEE ON AGRICULTURE AND FOOD TO CONDUCT AN
INQUIRY, IN AID OF LEGISLATION, ON THE DEVELOPMENT OF GOLDEN RICE OR
VITAMIN A RICE, A GENETICALLY ENGINEERED RICE, IN ORDER TO DETERMINE ITS
IMPACT ON HEALTH, ENVIRONMENT AND FARMERS' RIGHTS**

WHEREAS, Golden Rice or Vitamin A Rice is genetically engineered (GE) to force the rice plant to produce beta-carotene, a precursor of Vitamin A. It is being developed and tested presumably to address the problem in Vitamin A deficiency (VAD). It was developed from Golden Rice 1 (from bacteria and daffodil genes, which produce low levels of beta-carotene) and later to Golden Rice 2 (with genes from bacteria and corn, which, supposedly, has higher levels of beta-carotene). Golden Rice now has a set of new genes that never before existed in rice;

WHEREAS, the technology, methodology, seeds and variety to advance the Golden Rice is being owned by Syngenta, an agro-chemical transnational corporation which profits by investing in the global seed industry;

WHEREAS, Golden Rice or Vitamin A rice is being developed primarily by the International Rice Research Institute (IRRI) in partnership with transnational corporations and foundations and other public agencies such as Syngenta, the Bill and Melinda Gates Foundation, Rockefeller Foundation and USAID. The Golden Rice Humanitarian Board, a public-private partnership, was established to assist in the development and deployment of Golden Rice in developing countries, particularly in Bangladesh, Indonesia, India and other parts of Asia;

WHEREAS, in the Philippines, the Philippine Rice Research Institute (PhilRice) is the lead agency in the field testing and commercialization of Golden Rice. Philrice has bred the Golden Rice variety with PSB Rc82 and other local rice varieties;

WHEREAS, three seasons of Golden Rice field testing was done in five areas in the country and was harvested last 2013. However, IRRI in its website last 2014 stated that average yield of Golden Rice was unfortunately lower than comparable local varieties already preferred by farmers.

WHEREAS, early this year, the proponents again filed two applications for Golden Rice at the Department of Agriculture – Bureau of Plant Industry (DA-BPI). The application involves the Direct Use for Food, Feed and Processing and Field Trials of the said GM product in Muñoz, Nueva Ecija and San Mateo, Isabela.

WHEREAS, it was reported that the proponents of the projects on Golden Rice are already geared for its commercialization in the coming years. Commercialization of Golden Rice is tantamount to conducting uncontrolled human trials without adequate animal and pre-clinical safety studies. This is highly unethical and immoral.

WHEREAS, the claim that Golden Rice can address the problem of malnutrition and blindness due to Vitamin A deficiency is baseless and unscientific. It is argued that Golden Rice is merely a promotional product of agro-chemical corporations using public institutions to make possible the social acceptance of genetic engineering in food and agriculture;

WHEREAS, many scientists around the world have expressed serious concerns regarding the safety of genetic engineering technology and its effects on human health and environment. A number of studies have shown that genetically engineered food cause a wide variety of negative health effects in animals including: allergic reactions, stomach ulcerations, disturbed liver, pancreas and testes function, enlarged livers, excessive growth of lining of the gut similar to a pre-cancerous condition, alterations in blood chemistry, marked disturbance in immune system cell populations, slower growth rate, higher death rate and damages to the reproductive, respiratory and digestive systems;

WHEREAS, according to Resistance and Solidarity against Agro-chemical Transnational Corporations (RESIST), a broad alliance advocating against corporate control on food and agriculture, the problem of malnutrition and hunger is caused primarily by poverty and extreme social inequity. Vit A deficiency cannot be addressed in isolation.

WHEREAS, the Supreme Court in its December 2015 decision regarding the field testing of Bt eggplant ordered to permanently stop the field testing of Bt talong, an eggplant variety genetically engineered to produce its own toxin. Apart from permanently stopping the field testing of Bt talong, it also declared the Department of Agriculture's Administrative Order No. 8-2002 null and void resulting to a halt on the application for field testing, contained use, propagation and importation of genetically modified organisms (GMOs), such as Golden Rice, pending the promulgation of a new order in accordance with law.

WHEREAS, the public consultation process for the new policy, the DOST-DA-DENR-DOH-DILG Joint Department Circular No.1 Series of 2016 was railroaded and did not go through a meaningful and substantive participation of stakeholders and the public. The DA merely had token meetings with no proper feedback mechanisms nor ample time for scrutiny. As it stands, the new rules are still missing requirements for health impact studies regulatory standards and specific duties for regulation, and mechanisms to assure the independence of regulators.

WHEREAS, agricultural research must be based on the farmers' capacity and needs. It should take into consideration the diversity and complexity of the environment. Rich natural resources such as traditional rice varieties must also be maximized;

WHEREAS, local rice varieties are more suitable to the country's environment and climate and the same assures the farmers of better yield, and should be conserved and protected from contamination from GMOs;

WHEREAS, farmers rights should be safeguarded against the negative effects of globalization including the excessive power and influence of transnational corporations. Intellectual property rights and genetic engineering may compromise farmers' ability to produce food;

WHEREAS, biodiversity, environmental integrity of the world's food supply and farmers' rights are too important to be put at risk with the introduction of genetically engineered organisms in the market. Rice is life for us Filipinos; and

WHEREAS, genetically modified crops are not sustainable means to provide food for the people as it greatly compromises the environment, livelihood of the farmers and health of the consumers.

NOW, THEREFORE, BE IT RESOLVED AS IT IS HEREBY RESOLVED, that the Committee on Agriculture and Food conduct an inquiry, in aid of legislation, on the development of Golden Rice or Vitamin A Rice, a genetically engineered rice, in order to determine its impact on health, environment and farmers' rights.

Adopted,