

**Submission to Food Standards Australia New Zealand**  
**Application A1139 - Food derived from GM potato lines F10, J3, W8, X17 & Y9**

Ref: <http://www.foodstandards.gov.au/code/applications/Pages/A1139.aspx>

*"The purpose of the Application is to seek approval for food derived from genetically modified potato lines F10, J3, W8, X17 and Y9, which has late blight protection, low acrylamide potential, reduced browning (black spot) and lower reducing sugars."*

**PLEASE REJECT GM FOOD APPLICATION A1139**

**Reasons:**

**1. No independent testing looking for human health impacts, particularly off-target effects**

FSANZ must NOT approve A1139 in the absence of independent studies that are relevant to public health and in the absence of comprehensive labelling including that of processed foods such as packaged chips, crisps and wedges derived from genetically modified organisms (GMOs).

Before approval, side-effects must be assessed, especially in the diet of susceptible people, pregnant or breastfeeding mothers, young children, the elderly, and the sick. So please:

1. Ask the applicant for relevant, whole-of-life, multi-generational feeding studies.
2. Assess the results of transparent, independent feeding trials including chronic toxicity and acute allergenic testing.

We have seen the sad and tragic teratogenic effects of FASD (Foetal Alcohol Spectrum Disorder), thalidomide, smoking, chemical poisoning (eg. lead), pesticide poisoning (eg. Agent Orange), and nuclear radiation. All are examples of harmful manufactured agents that at some stage for some purpose, either profit or control, were approved by regulators.

"Silent Spring" by Rachel Carson "meticulously described how DDT entered the food chain and accumulated in the fatty tissues of animals, including human beings, and caused cancer and genetic damage. A single application on a crop, she wrote, killed insects for weeks and months—not only the targeted insects but countless more—and remained toxic in the environment even after it was diluted by rainwater. Carson concluded that DDT and other pesticides had irrevocably harmed animals and had contaminated the world's food supply."

Theoretical analysis of novel organisms alone is inadequate because unintended consequences are inherent in novel designs and current knowledge cannot know the unknown without looking for it.

So with application A1139, it is incumbent on FSANZ scientists to:

1. Analyse the applicant's data and experimental design.
2. Conduct feeding studies by reputable independent scientists that have no vested interest in the application.
3. Provide information on potential side-effects of ingestion so that consumers know what to look for.

## **2. No labelling means no informed consent and no traceability of public health impacts**

GM food approvals should be postponed until food labelling laws are comprehensive and complete so that consumers are fully informed of GM-derived ingredients and traceability and recall is possible. The fact that A1139 is for processed and packaged potatoes is a fair indication the GM producer is wanting to dodge GM labelling.

The GM potato is targeting a major commodity crop for corporate profit. Healthful food is not the design objective but the sales pitch. Engineered novel organisms carry additional risks as they have not been bred by conventional methods with a strong cultural history and multi-generational awareness of the effects.

So with application A1139, it is incumbent on FSANZ scientists to support full disclosure of GM-derived food so that consumers know the GM status of their food choices. To have to second guess from Country of Origin labelling is hopelessly inadequate in this regard.

## **3. Substantial equivalence is ill-defined, inappropriate and unscientific**

FSANZ, there is enough science out there and enough public health issues emerging to tell you that the precautionary principle **MUST** be applied when assessing genetically engineered products and that the ill-defined notion of substantial equivalence is an inappropriate yardstick. How can you declare the GM potato equivalent to the non-GM counterpart when the composite non-GM hybrid does not exist?

As you know from pharmaceuticals, some work well together for some people, but some have severe reactions. **Pharmacogenetics** and **pharmacogenomics** are emerging fields of study as there are so many unknowns with manufactured drugs and associated reactions of the human body. You can't just assume and let loose with no followup.

There is more than a decade or two of GM history for the public to assess and we can see the health problems emerging in ourselves and our families, and how we can reverse unwellness by moving to a non-GMO toxin-reduced diet.

## **4. GM potato does not improve health, indeed could contribute to making us sick**

The proposal is to import these GM potatoes from the Americas only in the form of fried chips, crisps and wedges with the vacuous claim of reduced acrylamide potential. If the potato is cooked in any of the many other ways, this purported health advantage evaporates. But encouraging us to eat "healthier potato chips" is contrary to current public health advocacy to reduce our intake of unhealthy fried foods that contributes to national illnesses like obesity, type 2 diabetes and non-alcoholic fatty liver disease, especially in children.

Since the GM potatoes will not be labelled, how can we choose them or avoid them anyway?

Colour is an important indicator of the freshness of food and whether pathogens might be present that might make us sick. Removing important cues of browning or black spot could therefore harm us rather than help.

## **5. Missing data for consumers**

A1139 has presented no data on taste and odour. If the GM potato does not bruise when damaged, how will we know whether it is “off”?

Nor any evidence on the greening colour of old potatoes that is an important alert to pregnant mothers to avoid those potatoes.

## **6. GM potato would not reduce waste, indeed likely to increase waste and destroy markets**

WA currently has a glut of potatoes and is starting an advertising campaign Todatoes to encourage consumers with recipes, to buy locally grown and support local potato growers.

GM potatoes imported from America and Canada are at odds with this initiative and could kill the local market by creating consumer uncertainty. People have to trust that what they put in their mouths will not make them sick. Indeed, food should be a celebration. If a product is tainted by misdirected profits and propaganda, consumers can easily choose to not buy. They could avoid potatoes altogether and turn to alternative sources of those nutrients and flavours.

There is a growing distrust of the GM industry, largely from the predatory practices and persistent lack of transparency.

## **7. Expensive, unnecessary and unwanted**

Removing the black spot by genetic engineering is a super-expensive heavy-handed way of doing it when I can just cut out the black spots before I cook the potatoes. Using “Innate” technology to create the GM potato is like using a sledge-hammer to crack a walnut. It might be fun, it might be a challenge, but is completely unnecessary, over-the-top and destroys the product in the process.

Genetically engineering GM potatoes to resist potato blight disease in the Americas is not our problem as Australia already has blight-resistant varieties.

Let’s not import Americas problem and create problems for ourselves that did not previously exist.

Reject GM potato application A1139.

With thanks,

Shirley Collins



Submission date: 7 July 2017