

22nd August 2020

[REDACTED]
Standards Management Officer
Standards & Surveillance
Food Standards Australia New Zealand
154 Featherstone Street
Wellington 6011
New Zealand

Dear [REDACTED]

Re: Application A1175 Rapeseed Protein Isolate

We are writing to you today to alert you to an ever increasing number of people who are suffering major physical and mental health issues linked to Rapeseed and the pesticides and insecticides that are used to grow these crops around the world.

Although your Application is specifically to do with Rapeseed Protein Isolate, the protein will be extracted from the Rapeseed plant the life cycle of which, from seed to harvest, is significantly controversial and the basis of our submission.

We are the "lucky" few that have identified Rapeseed, in all its guises, as the cause of our suffering and judging by the increase in numbers to our group and the number of supporters we are gaining through our public petition, we believe there are many more people suffering the dangerous side effects of Rapeseed around the world but who haven't made the link yet to this substance. And why is that?

We believe it is because there has been grossly insufficient and inconclusive research which categorically proves that Rapeseed is safe for Human Consumption. And yet it can be found in circa 95% of all processed food, baby formula, cosmetics, toiletries and vitamin supplements and is fed to animals throughout many countries throughout the world. In fact, to try to exist without ingesting this product in one form or other is becoming nigh on impossible.

The process which this substance goes through to make it "palatable" for humans and supposedly "safe" and "healthy" actually renders it almost worthless as far as nutrients are concerned. The "healthy" promotional platform that has been used very effectively to convince chefs, manufacturers and suppliers to use this substance, is, we believe, exceptionally misleading.

It has been our experience that with the continual build up of Erucic Acid within our bodies and the absorption of Neonicotinoids used in the pesticides and insecticides sprayed on these crops that the use of Rapeseed within consumer products is having a detrimental effect on our health and we have many case studies to support these claims. Traces of glyphosate have been found in human urine samples for example (Source: rapeseed-oil.ie)

The level of toxic pesticides and insecticides that are used to grow the Rapeseed crop is tragically decimating our bee communities, causing terminal illnesses in people (the most recent Bayer settlement in the US of \$10.9 billion to avoid admitting liability that Roundup Weedkiller causes Cancer is indicative of this) and rendering our arable soil infertile, with an estimated 40-60 years worth of good soil left on this planet. And yet, you want to potentially increase the use of Rapeseed as a protein isolate when it already represents over a third of

the world's crop growth producing 68.2million metric tonnes in 2019/20 going to an estimated 70.79million metric tonnes in 2020/21 (Source: ourworldindata.org)

We ask on what grounds are you doing this? Where is the independent research which categorically determines that this substance is safe for human consumption? Let us see what it is that you are basing your decisions on.

Based on the dangers associated with Rapeseed - in all parts of its life cycle as well as consuming the end products - where is the research?

Research using a few rats, mice and pigs which is the only research we have found to date, is not representative or indicative of the biological structure of the human being. And generic comments such as "is considered safe" used by many Food Standard Agencies and their governing bodies because the Erucic Acid content has been reduced through cross-breeding and genetic modification (and to reduce the natural bitterness of the product), is certainly not good enough when lives are at stake.

We realise that the Rapeseed and the insecticide and pesticide industries are enormous (Bayer's settlement figure of \$10.9 billion is indicative of their power and the depths of their pockets), but we have to make a stand for something we believe to be being railroaded through with an unsuspecting public just looking on and without due care and attention being demonstrated by the global FSAs and without anywhere near sufficient evidence of safety for human consumption.

We object wholeheartedly to your application to grant Rapeseed as a Protein Isolate to meet the "protein needs" of the general public and request sight of all of your documentation which specifically supports the use of Rapeseed for human consumption.

To refuse or ignore this request and to push your application through without addressing our very serious concerns would we believe be tantamount to signing a death warrant for our wildlife, our environment, our planet and the human race. It doesn't get more serious than that.

We look forward to your response.

With thanks and in hope,

Signed by members of the Allergy/Intolerance to Rapeseed Oil Group:

[Redacted signatures]