

1 April 2020

Mr. Mark Booth
CEO
FSANZ
Level 4
15 Lancaster Place
Majura Park ACT 2609

Reference: **A1192 – Food derived from herbicide-tolerant corn line MON87429**

Dear Mr Booth

I am writing in response to the submission and your media release statement that says-

“FSANZ undertook a full safety assessment which looked at the transferred genetic material, its stability, novel protein in the food, as well as the composition of the food and an evaluation of intended and unintended changes.

“FSANZ found that the corn derived from this GM line is as safe as traditional non-GM corn,” Mr Booth said.

SAFETY

Examples of products that were considered safe by authorities but proved long term to be toxic are littered throughout our global history. Roundup (wholly defended as safe) has been proven in several court cases to be directly linked to NHL, a cancer that affects the immune system. Most recently in May 2019, a pay out of \$2bn to a couple

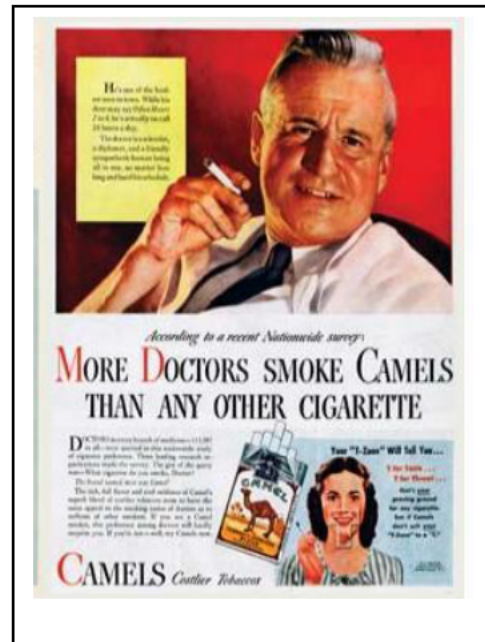
“The juries have repeatedly ruled that Roundup was defectively designed, that the company failed to warn consumers about the cancer risks, and that Monsanto has acted negligently. The cases have uncovered internal Monsanto documents that plaintiffs’ lawyers say reveal the ways in which the company has “bullied” scientists over the years and helped “ghost write” research defending the safety of glyphosate, the main ingredient in Roundup.: (The Guardian, ABC News 14 May 2019)

Asbestos, Cigarettes,(were physician tested) Pesticides, Radium(a medical cure-all, that causes cancer), Flame Retardants(PBDE), BPA,VIOXX (generated \$2 bn in revenue but increased risks of heart attacks even though approved by the FDA), DDT, Thalidomide, Global Warming and the list goes on. All government approved or in the case of Global Warming dismissed by governments!

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Better, naturally!



CONTROL

This GM Crop appears to be a MONSANTO product as it is called MON87429.

Herbicide tolerant (HT) crops are the biggest selling GM crops. These crops have been made to be tolerant to either Monsanto's weed killer RoundUp (glyphosate) or Bayer's weed killer Liberty (glufosinate ammonium).

Herbicide-tolerant GM crops have been attractive to the biotechnology companies as they have been able to

- sell both the herbicide and the GM seeds as a package
- place the same gene sequences into each of these major crop types
- gain intellectual property rights over the modified seeds and thus charge an annual technology fee.

(Gene Watch UK. 2014)

Please refer to this SCIENTIFIC LINK

GeneWatch UK response to USDA consultation on Dow's 2,4-D tolerant corn and soybeans (12th February 2014)

http://www.genewatch.org/uploads/f03c6d66a9b354535738483c1c3d49e4/USDA_24D_GWsub.pdf

Giant agricultural firms insist that GMO crops are not harmful to humans, but the world simply doesn't have enough evidence to make that absolute claim. **GMO crops have only gone mainstream in the past 20 years.**

Beyond that, giant agricultural firms should not have the right to own the genetic makeup of a particular strain of corn or soy or, in essence, patent nature. GMOs threaten the independence of farmers to provide food to us all by ensuring their sovereignty over what to grow.

"The introduction of GM (genetically modified) crops was offered as the solution for all the problems in agriculture and of food production. Farmers were promised that their introduction would decrease agrochemical usage and crops would become more nutritious and the higher yields would make it possible to feed the world. However, all the promises appear to be unfulfilled. Sadly, GM crops have proven to be co-responsible for further negative environmental impacts. Since the introduction of herbicide tolerant GM crops in the mid nineteen-nineties, herbicide use increased several-fold, and as a consequence, a large number of weeds have become resistant to the most commonly used herbicides, mainly to glyphosate. It appears that the answer to this problem by the biotech companies is to produce novel herbicide tolerant GM crops resistant to other, probably more dangerous compounds such as 2,4D, or to a "cocktail of herbicides". The introduction of insect resistant GM crops has had very similar effects: apart from the first couple of years the pesticide pressure on the environment grew rather than decreased, the reason being that every cell of those GM plants produces their respective pesticide 24/7. Under these conditions several pests developed resistance faster to pesticides produced by GM plants than expected. In addition to the amount of insecticides synthesized by these GM crops, additional spraying with more pesticides is also required to protect these crops. It became evident after the introduction of GM crops that they cause more environmental damage than conventional agriculture. They require additional agrochemicals and GM crops themselves produce more pesticides than those grown by conventional agriculture."

(Committee on World Food Security 27/2/2018

<http://www.fao.org/cfs/home/blog/blog-articles/article/en/c/1104228/>)

GMO crops are driven by corporate greed of a few major global chemical companies who are feeding deceptive hope to farmers on a short- term ROI basis. Surely our government can see the bigger picture and if not, that is their job!

CONSUMERS

At the end of this letter is a media release I recently distributed, which encompasses the words I sent to our South Australian politicians with regards to deregulating GM canola crops in South Australia.

It covers off several issues but importantly as a food manufacturer, what consumer trends are.

Research from Mintel Global New Products Database (GNPD) reveals that there was a 366% increase in 'GMO-free' claims on natural food/drink launches in Canada from 2007-17*, while 'no additives/preservatives' claims grew 21%**.

Natural/organic claims appear to serve as added reassurance of safety for moms and dads when it comes to what they are serving their kids
(Mintel 6 December 2018)

A large consumer study* from market researcher Health Focus International spanning 16 major consumer markets includes this pretty jaw-dropping statistic: 87% of consumers globally think non-GMO foods are 'somewhat', or 'a lot' healthier.

[HTTPS://WWW.FOODNAVIGATOR-USA.COM/ARTICLE/2015/08/13/87-OF-CONSUMERS-GLOBALLY-THINK-NON-GMO-IS-HEALTHIER](https://www.foodnavigator-usa.com/article/2015/08/13/87-of-consumers-globally-think-non-gmo-is-healthier)

It is a growing consumer trend. Surely as a country we should be on the consumer growth trend rather than the decline?

EXPORT

In June 2016, The University of Adelaide Centre for Global Food and Resources provided a report on the "Identification and Assessment of Added-Value Export Market Opportunities for Non-GMO labeled Food Products from South Australia, on behalf of the Department of Primary Industries and Regions, SÁ.

This report can be viewed here

https://www.pir.sa.gov.au/data/assets/pdf_file/0005/282173/Full_Report_Adelaide_University_GM_Report.pdf

Below is their summary and a graph of global growth in this area.

In summary, the results of the review and analysis process indicate that:

- *Global food trends indicate that discerning consumers are increasingly seeking foods that are 'natural[y] healthy', have a 'clean' label with simple ingredients (including Non-GMO), and have identifiable provenance that links consumers to producers.*
- *Attitudes to GMO's in food varied by the country studied and over time_ Consumers in the UK and Japan are relatively relaxed by GM labelling (most likely because, until recently, both countries prohibited GM commercial crops); Chinese consumers are very concerned about food safety because of past problems, and surprisingly, the strongest growth in consumer demand for Non-GM food is in the United States.*
- *Analysis of 'proxy' categories for Non-GM foods showed the strongest growth in the Organics category in the US and the Naturally Healthy category in China.*

- *Data from the Mintel Global New Products Database shows the 15.7% of all new food and beverage products launched in the US in 2015 made Non-GMO claims vs. only 2.13% in 2012; and 13.5% of new product made organic claims in 2015.*

SUMMARY

1. Corporate greed from large multinational companies are driving this.

Biotech companies have certainly profited from GM crops, not least because seeds and genetic innovations can be patented. Monsanto, for instance, can sell both Roundup herbicide and Roundup-resistant corn and soybeans to farmers, who must repurchase the seeds every year.

(<https://www.vox.com/2014/11/3/18092770/who-profits-from-gmo-technology>)

The benefits are at best very short term for farmers."The introduction of insect resistant GM crops has had very similar effects: apart from the first couple of years the **pesticide pressure on the environment grew rather than decreased**, the reason being that every cell of those GM plants produces their respective pesticide 24/7. Under these conditions several pests developed resistance faster to pesticides produced by GM plants than expected."

(Committee on World Food Security 27/2/2018

<http://www.fao.org/cfs/home/blog/blog-articles/article/en/c/1104228/>)

2. Consumers are globally trending towards more natural foods that are "free from"

Even though consumer awareness and knowledge of genetically modified organisms (GMOs) aren't very high, a recent online survey from the International Food Information Council (IFIC) Foundation found that shoppers will typically avoid these foods if possible. In addition, consumers want food labels to tell them whether GMOs are present.

<https://www.fooddiver.com/news/concerns-about-gmos-prompt-consumer-demand-for-labels/526583/>

As cited in the biennial research study by the Hartman Group(www.hartman-group.com) in the US called Organic and Natural 2018-

"More troubling for mainstream products with GMO ingredients is how shoppers are voting with their pocketbooks. Consumers told Hartman researchers conventional food and beverage products constitute 54 percent of their grocery purchases, down from 65 percent two years earlier. More than a third of buyers of organic and natural products cited avoidance of GMO products as a motivating factor.

Those sentiments are supported by the meteoric rise in non-GMO certified products, from a baseline of \$348.8 million in 2010 to \$26 billion today, according to the Non-GMO Project.

Despite an eight-year head start, certified organic sales now trail those certified as non-GMO in many categories.

What people say and what they do are not necessarily the same; nonetheless, the swelling ranks of people who say they avoid buying GMO foods are cause for mild panic. When Hartman asked 11 years ago, only 15 percent said they avoid them. The proportion has increased in every subsequent survey, tripling to 46 percent."



Figure E. Growing demand for non-GM foods

Australia has a bright future as a Clean Green Food Bowl which will attract premiums. It is that vision which is needed by our regulators to guide our country to greater prosperity long term, rather than quick short-term fixes that appear to have financial benefit, but long term is detrimental to both profit and the Australian community.

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MEDIA RELEASE

4 March 2020

Stop GM crops in SA

Tucker's Natural joins Maggie Beer, BD Paris Creek Farms, San Remo and Johnny's Popcorn to support the moratorium that ensures GM crops are banned in South Australia.

*'GMO's rank within the top five food concerns globally. GMO concern is even surpassing ingredient concerns such as sugar, sodium, hydrogenated oils and artificial ingredients'*¹

Sam Tucker, owner of Tucker's Natural is calling for the South Australian Food and Beverage industry to stand up and be counted.

"This is a moment in time when as an industry we have the opportunity of guiding and protecting our State's future against the greed and power of three very large international chemical companies that have an undesirable hold on seed markets globally². The push in South Australia for GM Canola is not about improved benefits to farmers but about corporate profits."

"This will only start with GM Canola and then it will be open the flood gates to other GM Federal approved crops including fruit and vegetables. If the World Health Organisation (WHO) dedicates a full page to GM foods and their assessment, then alarm bells should be ringing!" he said.

Steven Marshall, who is our people's representative is bowing to voices funded by multinational chemical companies who want GM Canola. Yet the cropping report for June 2018-2019 for SA shows a 14% drop in canola planting below the 10-year average, which reflects an increase in the area planted to barley and pulses (more profitable crops) at the expense of canola.

<https://www.agriculture.gov.au/abares/research-topics/agricultural-commodities/australian-crop-report>

Is Stephen Marshall appraised of the true facts? Why fight for GM Canola when there are more profitable alternatives for farmers which reflect the global consumer trend.

¹ 13-Aug-2015 By Elaine Watson

A large consumer study* from market researcher Health Focus International spanning 16 major consumer markets includes this pretty jaw-dropping statistic: 87% of consumers globally think non-GMO foods are 'somewhat', or 'a lot' healthier.

[HTTPS://WWW.FOODNAVIGATOR-USA.COM/ARTICLE/2015/08/13/87-OF-CONSUMERS-GLOBALLY-THINK-NON-GMO-IS-HEALTHIER](https://www.foodnavigator-usa.com/article/2015/08/13/87-of-consumers-globally-think-non-gmo-is-healthier)

² https://www.who.int/foodsafety/areas_work/food-technology/faq-genetically-modified-food/en/

When Austrade details on their website-

"With an increasing number of suppliers to choose from, global buyers are increasingly seeking out segmentation, unique product attributes and assurance of traceability.....Australian exporters supply international customers who are seeking greater differentiation and require specifications such as non-GMO, organic or a specific region."

Then surely Steven Marshall and all other State politicians should be heeding the advice of the experts. Austrade goes on to cite a large export market for Australia.

"One country Japan relies heavily on Australia's agricultural commodities and imports around A\$697 million in grains, oilseeds and pulses from Australia each year (ABARES). According to Austrade there are market opportunities in "Non-GMO grain products for both human consumption and as feedstock" <https://www.austrade.gov.au/australian/export/export-markets/countries/japan/industries/Agribusiness-Grains-and-pulses>

Sam Tucker goes on to explain....

All Tucker's Natural products are certified non-GM and the demand for this certification continues to grow globally. In the US, the specialty food market requires Non-GM or Organic certification to be considered for inclusion in this billion-dollar segment.

Sadly, Labor and now a couple of key Independents have changed their dialogue in recent weeks to suggest that they will back down on maintaining the state-wide moratorium and seek only to secure this status for Kangaroo Island.

I am not sure how this rationale works? If it is such a wonderful thing, then why is Kangaroo Island exempt? The rationale for their exemption is it gives them a competitive advantage to selling internationally as non-GM Kangaroo Island crops. They receive a premium for this.

Okay, well this applies to ALL South Australia.

If it is a strong enough argument for Kangaroo Island then it is good enough for the rest of South Australia, otherwise it is discriminating.

Don't open the gate to GM

Once the gate is opened, it can never be shut again. GMO will be here to stay and with no barriers to grow other than the Federal Gene Technology Regulator (OGTR) in Canberra, who is responsible for regulating all genetically modified organisms (GMOs) through the *Gene Technology Act 2000*.

Unfortunately, I feel there is a general apathy in the South Australian Food and Beverage Industry who may feel it is only confined to canola. While canola is the first crop, this can be extended into other crops as well as fruit and vegetables. It is only confined by the approvals issued by OGTR. This is not just about canola; it is about all future farming crops and produce.

Ultimately, the politicians are the ones that will vote and decide on this issue with or without our say. We remain hopeful that fellow producers/manufacturers will voice support loudly for the moratorium on GM crops to remain in place. This will secure our global competitive advantage and ensure remains Clean and Green.

FURTHER INFORMATION

Owner/Founder Tucker's Natural
www.tuckersnatural.com.au

Please act to defend SA GM-free

Keep SA GM-free till 2025 as parliament agreed. The Marshall government wants to end the GM ban.

Please send your support for GM-free crops and foods to:

- Liberal SA Government: Tim Whetstone 08 8226 2931 Minister.Whetstone@sa.gov.au
- ALP: 08 8237 9137 laborleader@parliament.sa.gov.au
- ALP Federal : Eddie Hughes 08 8645 7800 eddie.hughes@parliament.sa.gov.au |
- ALP Federal: Leon Bignell 08 8384 6344 leon.bignell@parliament.sa.gov.au>
- SA Best: 08 8237 9145 <bonaros.office@parliament.sa.gov.au
- SA Best: Frank Pangallo pangallo.office@parliament.sa.gov.au
- The Greens Mark Parnell: 08 8237 9111 parnell@parliament.sa.gov.au

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