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To whom it may concern,

ON WHAT MORAL GROUNDS is our food regulator Food Standards of Australia & New Zealand (FSANZ) proposing dangerous changes to our food regulations? Dangerous because it would allow a wide range of Genetically Modified (GM) foods to further enter our food chain without appropriate regulation and with no labeling, and without the informed consent of all consumers.

Children and fetuses should not be made unwitting participants in a food experiment.

1) This could pose potential health risks and would seriously undermine our right to know how our food is produced.

1) In surveys, most people in Australia and internationally are opposed to eating genetically modified (GM) foods. Our family and friends are opposed to eating GM.

We are all worried and cynical about the way GM ingredients are hidden in processed foods. Why the secrecy? Duty of Disclosure applies.

2) All GM foods should require independent assessment for the health, environmental hazards and risks they pose.

3) All GM foods should be boldly labelled as GM !

4) Traceability must be assured. This allows farmers, food producers, food distributors, retailers and shoppers especially to avoid them for many valid, important reasons.

Traceability is vital to the diagnostic and ongoing research work of medical and health professionals.

5) Children should not be made unwitting participants in a GM food experiment.

6) Independent, peer-reviewed, long term medical research on GM foods has still not been done.

8) GM food corporations would like to break down all trade barriers to GM foods entering Australia; especially unlabeled GM foods, because such barriers get in the way of their profiteering. But those barriers are set up in Australia to protect human and environmental health, these barriers must be guarded and retained.

9) Corporations involved would not meet best practice Australian Standards of Corporate Social Responsibility and Human Rights (CSR), indeed CSR would be undermined.

10) I am therefore strenuously opposed to changes to the Food Code that would allow a wide range of GM foods, made using novel methods that have scant history of safe use, to be sold without safety assessment or labelling. These would include meat and milk from some genetically modified animals and substances like vanilla and stevia produced by genetically modified microbes in factory vats.

9) These changes would undermine FSANZ's key responsibilities to ensure food safety and our right to know what is in our food.

10) Agrochemical companies cannot be trusted to self-assess the safety of GM foods as they have an appalling record of manipulating data to promote dangerous products. Everyone knows companies cannot regulate themselves.

Chemical pollution, as in agriculture and notably in GM crops, is looming as one of the three greatest threats to human and planetary health, alongside air pollution and climate change..

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11) Gene editing techniques have been found to make genetic changes that could never occur in nature and to result in widespread genetic damage that often goes undetected by GM developers.

12) Deeply concerning to me is the reliance of FSANZ on advice from 'scientists' with serious conflicts of interest, resulting in FSANZ concluding that these new GM foods pose no greater risks than existing foods. FSANZ must be independent it must not be a party to any conflicts of interest.

Those seeking to commercialise GM plants, animals and microbes should play no role in deciding how - or even whether - foods derived from them should be regulated.

13) The proposed changes would make Australia one of very few countries in the world to allow genetically modified animal products into our food chain with no regulation or labelling. This would put us at odds with our international trading partners, which FSANZ admits "may have a significant impact on trade". The Cartagena Protocol on Biosafety, an international agreement signed by 166 governments worldwide, and the UN's food standards body Codex Alimentarius agree that all GM techniques differ from conventional breeding and that pre-market safety assessments are essential before GM organisms are used in food.

I support expanding the definition for 'gene technology' so FSANZ continues to assess and regulate all techniques and methods of genetic modification, other than conventional breeding. The proposal to deregulate new and emerging GM techniques and their food products, which pose new and unassessed risks, is completely unacceptable.

Thank you for taking my well-founded and informed concerns into consideration.

Yours sincerely,

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