



FOODwatch

Working to keep Western Australia GM-free from farm to plate...

www.foodwatch.net.au

10 February 2015

Submission to Food Standards Australia New Zealand Application A1097 - Food derived from Herbicide-tolerant BT dsRNA GM Corn

<http://www.foodstandards.gov.au/code/applications/Pages/A1097GMCornLineMON87411.aspx>

<http://www.foodstandards.gov.au/consumer/gmfood/applications/Pages/default.aspx>

REJECT GM FOOD APPLICATION A1097 MON87411

FSANZ must NOT approve A1097 in the absence of data from feeding studies with parameters that are relevant to public health. Side-effects must be assessed, especially in the diet of susceptible people, pregnant or breastfeeding mothers, babies, children, the elderly, and the sick.

Before approval of A1097, full product disclosure labelling must be in place in Australia and New Zealand so that supermarket shoppers can make an informed choice based on the GM status of the food and so that traceability and recall is possible.

US Senator Bernie Sanders, Vermont said recently: *"There has never been mandatory human trials of genetically engineered crops, no tests for its possibility of causing cancer, or for harm to foetuses, no long term testing for human health risks, no requirement for long term testing on animals and only limited allergy testing. What this means is that for all intent and purposes, the long term health study on GE food is being done on [us] ... we are the clinical test!"*

Not only do we require pre-evaluation, but post-evaluation epidemiological studies must be undertaken. This is only possible with derived-from labelling of GM ingredients traceable back to the source.

In September 2012, Seralini et al published the results of a long term feeding study on GM corn NK603 genetically engineered to tolerate [absorb] the herbicide Roundup. This study found quite alarming health outcomes when 3 groups were compared with controls. The 3 groups were:

1. RR GM corn grown without Roundup
2. RR GM corn grown with Roundup in the usual way for RR crops
3. Roundup

FSANZ approved NK603 in 2002 and conducted a preliminary re-assessment on the findings by Seralini et al. FSANZ was unconvinced by the Seralini study judging that it was short on scientific rigour.

Therefore, the Seralini study can be considered a base benchmark. Before approval of application A1097, FSANZ must ensure that the scientific rigour of the feeding studies of the GM corn conducted by the A1097 applicant is more rigorous than that of the NK603 study by Seralini et al.

From information in the public arena about application A1097, there is no evidence that feeding studies have been done at all.

The study by Seralini et al was for GM corn tolerant to one herbicide (glyphosate, the active ingredient in Roundup). The A1097 GM corn is glyphosate-tolerant but also genetically engineered to exude BT pesticide and involves dsRNA untested in commercial release. So the feeding studies would require groups that test every combination and load of these three engineering. The herbicide must be tested in the formulations available to farmers, because as Seralini et al determined from testing Roundup, it is the **adjuvants** that can have significant health impacts. On-farm mixing of chemicals must also be tested. FSANZ must not approve application A1097 until the results of such feeding trials can be assessed.

FOODwatch also draws attention to the inadequacy of the current regulations. **There are no guidelines yet for GM food.** For approval of GM foods, FSANZ has adopted the OECD guidelines for approval of chemicals. This is convenient for the GM industry. The GM companies are chemical companies (“the big 6”) so are well versed in the regulatory requirements of the chemical guidelines. The GM seed patents are owned by the GM chemical companies and the GM seeds are sold to farmers hand-in-hand with the chemicals they are designed to tolerate.

The chemical guidelines typically require 90 day feeding studies and 3 dosages, although often GM food applications submit only 2 dosages!

But the chemical guidelines were not designed for assessment of ingested products of unknown quantity, combination and frequency in a daily diet. Approvals of novel foods require whole of life, multi-generational assessment of health outcomes.

Genetic engineering is a completely artificial process. The outcomes of gene splicing are inherently unpredictable. Insertional mutagenesis can cause hundreds and thousands of mutations which disrupt the host resulting in novel toxic effects, allergies and altered nutrients.

GM foods require in-depth molecular analysis and must be evaluated generically with feeding studies and human trials. Genetic engineering poses new risks. Outcomes cannot be predicted based on biochemical analysis alone. As genetic engineer Dr Michael Antoniou, Ph D, Kings College London said, “If you only look for known things, you’ll miss the unknown.”

Food regulators for Australia and New Zealand must do the job that they are legislated to do.

PROTECT PUBLIC HEALTH SAFETY - REJECT APPLICATION A1097

FOODwatch representative (WA)