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From: [REDACTED]
Sent: Friday, 23 June 2017 1:49 PM
To: standards management
Subject: Submission A 1140

Categories: [REDACTED]

Submission A 1140

23 June 2017

Dear FSANZ

I oppose application A1140 and ask that you stop the clock and require comprehensive safety data on all the end products. Until then FSANZ must decline the application.

The reasons I ask this is due to recent evidence that has not been provided by the applicant on the possible toxicities of the significant differences in the data that shows there is no equivalence.

FSANZ states in their conclusion

No potential public health and safety concerns have been identified in the assessment of MS11. On the basis of the data provided in the present Application, and other available information, food derived from MS11 is considered to be as safe for human consumption as food derived from conventional canola varieties.

This statement is reiterated in every application. However there is no scientific evidence to back up this assertion. The references cited never discuss the end use effects — namely human consumption. The applicant has clearly shown that there are significant changes to the canola, however there appears to be no independent assessment that considers end product ingestion.

This is a deep flaw in the assessment process and in breach of the legislative rules that FSANZ is governed by. The assessment does not require tests of safety so there is a lack of information that compromises food chain safety. The worst part of this is as oils do not need to be labelled, there is no warning of the dangers that GM sourced canola may have for vulnerable public.

The total glucosinolates were significantly changed and could cause severe reactions if eaten. Further DairyNZ has completed detailed investigation into the deaths of hundreds of cows after eating HT swedes in New Zealand. Many hundreds of cows died from liver failure from the high levels of glucosinolates in the HT swedes. The findings also concluded that the reproductive parts of the plant were significantly higher in glucosinolates than the bulb and leaf. The seed (reproductive part) is mainly used for oil in human consumption and animal feed as rapeseed cake. The two glucosinolates gluconapin and progoitrin have metabolites that interfere with thyroid function.

THE EFSA