

Submission re: Application A1276 – Food derived from herbicide-tolerant soybean line MON94313

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There are several safety concerns with this application.

1. Testing is too limited.
 - a. “no major DNA rearrangement” was observed¹. There is no mention of how the human or animal organisms may respond to the potentially ‘minor’ DNA rearrangement.
 - b. This variety will be bred with other GM varieties²; there is no evidence that safety testing has been carried out on the resulting variety.
 - c. The resultant proteins, being very similar to proteins already tested as safe, are deemed to be covered by those tests³.
 - d. Another protein, identical to that found in an unrelated native species, is deemed safe³; no testing has been done on this protein in this context.
2. The University of Queensland states that scientists “don’t really understand the genomes of many plants and animals we eat”⁴. Therefore, logically, genetic modification will almost certainly involve unforeseen outcomes.
3. It is contended that “Small fragments of DNA from food can and do enter the blood stream and body organs”⁵.
4. No long-term and inter-generational studies have been carried out on any GM crops^{5,6}.
5. Indeed the Royal Society suggests that ongoing monitoring should mitigate risks⁷. This represents a significant ethical issue for GM crops: it looks like an un-announced mass experiment.
6. Environmental risks are not assessed.
 - a. Weeds resistant to glyphosate are cited as a reason for this proposed further genetic modification, with the suggestion that the best approach is introducing a range of herbicides⁸. No long-term studies are cited showing that ongoing use of an increased range and amount of herbicides is environmentally safe.
 - b. It needs to be demonstrated that cross-pollination will not contaminate, for example, organic or heirloom crops.
 - c. Effects on bees and other insects need to be studied.
 - d. Long-term effects on the soil as GM crops die and rot need to be studied.
7. The assessment does not consider the ethical problem of patenting a food crop.
 - a. There is no assessment of the financial risk to farmers who need to annually buy their permitted GM plants^{9,10,11}.
 - b. There is no addressing of the philosophical question of patenting a plant. I am not convinced by the argument that collecting seeds is not a human right¹². There seem to be sinister attempts both to remove human autonomy, and to introduce changes highly unlikely or impossible to have happened by chance: thus directly intervening in the scientifically theorised evolutionary process.
 - c. Ironically, the unexplained precision observed at many levels of the natural world seems to defy reliance on chance origins, and hints at the spiritual question of a Designer, whom some call God, some call Nature. The practice of genetically tweaking and patenting plants does seem to be asking for trouble on many fronts if we are indeed messing with something bigger than we realise.

The above points indicate ways in which this application represents neither rigorous science nor ethically sound practice.

I therefore submit that this, and all other genetically modified food crops, be placed on moratorium until rigorously tested on at least three generations of willing humans, including during pregnancy, if this can be passed by an ethics committee.

1. https://www.foodstandards.gov.au/code/applications/Documents/A1276%20Exec%20summary_Redacted.pdf p.3
2. Op.cit. p.2
3. Op. cit. p.4
4. <https://qaafi.uq.edu.au/article/2023/05/what%E2%80%99s-latest-gmos-and-gene-edited-foods-%E2%80%93-and-what-are-concerns>
5. <https://www.medicalnewstoday.com/articles/324576#cons>
6. <https://www.consumerreports.org/cro/magazine/2015/02/gmo-foods-what-you-need-to-know/index.htm>
7. <https://royalsociety.org/topics-policy/projects/gm-plants/gm-crops-have-been-around-20-years-might-there-still-be-unexpected-untoward-side-effects/>
8. https://www.foodstandards.gov.au/code/applications/Documents/A1276%20Exec%20summary_Redacted.pdf p.2
9. <https://royalsociety.org/topics-policy/projects/gm-plants/how-are-gm-crops-regulated/>
10. <https://sitn.hms.harvard.edu/flash/2015/the-patent-landscape-of-genetically-modified-organisms/>
11. <https://heinonline.org/HOL/LandingPage?handle=hein.journals/reel13&div=40&id=&page=>
12. https://en.wikipedia.org/wiki/Talk:Percy_Schmeiser##