

From: Steffan Browning [greeny25@xtra.co.nz]
Sent: Tuesday, 19 April 2011 6:00 PM
To: submissions
Subject: Soil & Health Submission to A1042 - Food derived from herbicide-tolerant Corn line DAS-40278-9

Soil & Health Association of New Zealand

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SUBMISSION to: Food Standards Australia New Zealand, PO Box 10559, Wellington
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19 April 2011

Re: Application A1042 - Food derived from herbicide-tolerant Corn line DAS-40278-9

Dear FSANZ,

The Soil & Health Association of NZ OPPOSES the Application and Assessment findings for Application A1042

The Soil & Health Association of New Zealand Inc is 70 years old, and is the largest membership organisation supporting organic food and farming in New Zealand, and as such advocates for healthy and safe food and environmental sustainability.

Soil & Health has a membership of about 3000 members and a readership of its retail magazine publication *Organic NZ* of many thousands.

Soil and Health members and supporters prefer food without chemical residues, GE and nanotech components or contamination, and to this end are particular as to the food they purchase.

The FSANZ mission statement is:

- *To protect, in collaboration with others, the health and safety of people in Australia and New Zealand through the maintenance of a safe food supply.*

1. FSANZ has provided inadequate safety testing (sec10: 4) on the Herbicide Tolerant 2,4-D Corn Line. FSANZ cannot ensure a safe food supply for the citizens of Australia and New Zealand.

2. This Herbicide Tolerant 2,4-D Corn Line is potentially dangerous to our consumer members. The application does not address food safety confidently to consumers. We are concerned about

the range of negative metabolic, immune and digestive effects that might occur once the corn line is eaten.

- 3.Independent studies** published over the last 12 years show many problems with the introduction of GE into the food chain. FSANZ has access and is aware of most of the independent studies. Soil & Health would like FSANZ to give less credence to its overseas counterparts and the applicants own data as it appears independence has been compromised.
4. **No long term testing** studies; data on corn line DAS-40278-9 safety status was poorly derived; no maximum or minimum amounts of contaminants, residues, alkaloids or other protein changes that may be present in plant food or able to recombine with the micro flora of the digestive system has been provided. 2,4-D, its salts and esters is on the Environmental Risk Management Authority (ERMA) Chief Executive Initiated Reassessment (CEIR) list, as it's safety is in question. For a food derived from a plant intended to be sprayed with such a chemical, to possibly be available for public consumption is unacceptable. The previous herbicide resistant crops have now been shown to be riskier than first anticipated due to glyphosate being shown to cause deformities in embryos. The previous herbicide resistant crops as a technology have failed as resistance to the heavily used and contaminating herbicides has developed, hence this application for a food derived from a management using a herbicide that could never have been predicted to be used on food, and that has the cultural connection with Agent Orange. 2,4-D is also subject to dioxin contamination and no confidence can be gained from the FSANZ documents that the corn will not be similarly contaminated. Soil & Health is concerned about the huge range of metabolic, immune and digestive effects that are possible from eating this corn, with new inherent compounds and pesticide residues.
5. There is no data on its safety status; no maximum or minimum amounts of contaminants, residues, or other changes that may be present in plant food or that may be able to cause health problems.
- 6.**This lack of safety data** should put the application on hold until comprehensive safety studies are conducted that meet the International Codex parameters.
- 7.**Ensuring the best health is paramount** for the families of our members. It is also important that groups like the poor, elderly, children and health challenged are assured that the food they eat will not worsen existing negative health conditions or cost anything to rectify any problems associated with eating the GE corn.
- 8.**The lack of diagnostic tools** for transgenic detection by health practitioners is a severe omission in preserving and ensuring public safety.
- 9.**Allergies to food products** have risen over the last few years. It is no coincidence that the rise has coincided with the introduction of transgenic approvals.
10. **There is no** data about how 2, 4_D corn will interact, recombine, or transform with other GE foods

In the interests of public health Soil & Health asks that the Application A 1042 is **rejected** until full comprehensive safety data can be provided.

Steffan Browning

Spokesperson

Soil & Health Association of New Zealand

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