

SUBMISSION to : Food Standards Australia New Zealand, PO Box 10559, Wellington
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Your Name: Dr Annie Stuart

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Date: 19/4/11

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

Dear FSANZ,

I reject the assessment of Application A1042.

The FSANZ mission 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.*

I have several concerns regarding this application, in that the acceptance proposed by FSANZ does not adequately protect the health and safety of citizens in wither country.

First, there is no substantial reason given for the need to introduce a genetically engineered corn variant. As 2-4-D was originally developed in the 1940s to control broadleaf weeds growing alongside cereal crops like corn (harming di- but not mono-cotyledons), why is genetically engineered resistance required for corn at all? This is not adequately explained in the proposal.

Given that the purpose is to make the GE corn tolerant to the named herbicides, so that the GE corn survives spraying, it is obvious that either:

1) conventional corn is no longer resistant at current levels of application of 2,4-D or quizalofop-P-ethyl, when these herbicides are used at prescribed safe levels. From this it follows that corn, a global staple, has become vulnerable due to continued and/or cumulative exposure to these frequently used herbicides. If this is the case, it is an indictment of both the industrial agriculture approach and the attempts of involved companies to meddle further with the plants on which we all rely.

Or, 2) broadleaf weeds have themselves developed resistance to current levels of herbicide application (as happens eventually with most weed species, including those growing alongside GE Roundup-resistant plant crops), and future frequency or concentrations of spraying with 2,4-D or quizalofop-P-ethyl, must be raised to ensure the same level of weed control. A GE tolerance is therefore seen as necessary if corn crops are to survive heavier levels of spraying than those they might currently survive. If this is the future scenario inherent in the proposal for this GE strain, then the spray regime associated with it and the potential residue load must be a factor in FSANZ's assessment of risk to public health and safety. To consider this irrelevant is a nonsense.

FSANZ 2nd safety assessment states:

"The major residues generated on corn line DAS-40278-9 as a result of spraying with 2,4-D and quizalofop-P-ethyl are not novel. The residues are the same as those found on conventional crops sprayed with 2,4-D or quizalofop-P-ethyl. Residue data, derived from supervised trials, indicate that the residue levels for both herbicides are below the limit of quantitation. In the absence of any measurable exposure to either parent herbicide or their metabolites, the risk to public health and safety is likely to be negligible."

I query whether 'supervised trials' (by whom?) take into account the field situation, where if the herbicides are used with conventional corn as part of a weed-control programme, these plants would in fact receive the same concentration of toxic sprays as the herbicide-resistant corn will receive in the future in the course of cultivation. Without fully assessing the risks of these herbicides and their metabolite constituents, and the interactions between these herbicides, FSANZ fails to take a

coherent view of the proposal.

In this case, because of the evidence for toxicity (proven thyroid affects, endocrine disruption and potential carcinogenic effect) of 2-4-D and its metabolites in particular, introduction of GE corn and subsequent associated spraying regimes raise serious concerns for human health, both through exposure of workers, through the food chain, and through leaching into water supplies (I know that the first and last are not specific FSANZ responsibilities as they occur in the producer countries, but just as we have to take WTO obligations into account, we need also to consider the wider responsibilities inherent in our consumption and trade decisions).

Altogether, I remain unconvinced that relying on trials undertaken by the company applying to introduce this engineered corn, can provide categoric or even adequate safeguards and assurance that there will be no future health effects from this GE product. As an historian who has worked in the area of agricultural development, I am only too aware of the pattern of pressure to accept various forms of technology as 'progressive', and the way in which regulatory safeguards for environmental, human and animal health have been shown to be overwhelmed by business interests. In more cases than is acceptable, results have been deleterious. I believe it behoves FSANZ to take a truly precautionary approach, and do not consider that has been adequately followed in this case. Any consideration of safety should take into account the question, "Is there a safer option available than the one proposed?"

Furthermore, its introduction has obvious ramifications for the consumer who may have strong objection to ingesting GE-derived products, but will not have access to the information that will consistently enable him/her to make that choice. Amongst my family are several close relatives with food allergy and intolerance problems. I consider that GE-derived products add another layer of complexity in allergy-prone individuals, and that the pernicious ubiquity of GE now in human diets, the presence of altered proteins, amino acids and gene re-combinations, are contributing factors. Contrary to FSANZ conclusions, the introduction of this corn into NZ does not expand consumer options; rather it constrains them by making the availability of non-GE corn less likely in the future. We should not be ceding our food supply sovereignty and choice to a chemical company.

Who is going to monitor and ensure that there are no future health effects arising from this corn? Who takes responsibility for the risks of its introduction? Who is going to monitor for potentially new, currently unknown metabolites or other toxins resulting from the GE corn's interaction with different environmental conditions and cultivation regimes, so that we in New Zealand can be assured that what we consume, unwittingly, is safe? Dow has already shown its refusal to take responsibility for the unforeseen consequences of its production here in NZ; I do not consider that its control of testing is insurance against future harm.

In summary, I concur with the following points:

1. **There is** inadequate safety evidence on the Herbicide Tolerant 2,4-D Corn Line.
2. **This 2, 4-D corn** is a potential risk to my health. FSANZ is failing to maintain standards for a safe food supply for the citizens of Australia and New Zealand.
3. **Independent safety studies** published, after regulatory approvals of foods, in the last ten years show many problems with the introduction of GE into the food chain.
4. **The application assessment** does not address my safety as a consumer. I am concerned about the huge range of metabolic, immune and digestive effects that might occur once eaten.

5. **No long term testing** has been done. 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 dietary health** is paramount for my family. It is important that groups like the poor, elderly, children and health-challenged are assured that the food they eat will not worsen their health conditions.
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 me and my family's public health I ask that the Application A 1042 is **rejected** until full comprehensive safety data can be provided. Further, if we are too carry the burden of care in choosing what we eat, then regulatory authorities must ensure that TOTAL AND FULL information on the constituents of all food is readily available.

Yours sincerely,

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