

## submissions

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**From:** HW [REDACTED]  
**Sent:** Thursday, 22 August 2013 4:06 PM  
**To:** submissions  
**Subject:** Submission A1081- Food derived from Herbicide-tolerant Soybean Event SYHT0H2

I object to the proposal to allow BT genetically modified soy or any other type of genetically modified foods to be sold in Australia and believe that direct manipulation of nature on a genetic level should be prohibited by global legislation in order to protect nature, humans, the food chain and the environment from manipulation for profit.

I believe there are far more intelligent and humane ways to feed impoverished people and to fix agricultural problems than resorting to gene manipulation. A recent documentary entitled 'Green Gold' featured scientists who demonstrated that it was possible to completely transform long term arid land into fertile food producing land within a three year period by use of permaculture. If such results can be achieved in such a short period of time in the most desolate of landscapes, then working intelligently with nature instead of trying to manipulate it genetically clearly would seem to hold very real potential to transform agriculture and create truly self sustaining communities globally. See: <http://www.youtube.com/watch?v=YBLZmwIPa8A>

In regard to the BT soy application specifically, since soy oil, or vegetable oil containing soy as well as other forms of soy, are ubiquitously present in such a huge range of processed foods from breads to soups, cereals and muesli, yoghurts, tinned and frozen meals, salad dressing, crackers, even health food bars, chocolate and vitamin supplements, it would be misleading to consider the allowance of GM soy oil in Australia as representing limited use. In allowing the entry of GM soy oil or other GM soy ingredients into processed foods FSANZ would in fact essentially be allowing the presence of GM content in virtually every processed food and giving GM companies a free market in Australia. Allowing GM soy into animal feed would be a very bad move. In a documentary, 'Patent For A Pig' released in 2006, farmers spoke first hand regarding the terrible problems such as stillbirths that they experienced in their animals after they were sold on the benefits of GM feed for their livestock. This would be a very bad move from a market perspective for those raising livestock for sale in Australia. Such problems have been reported globally, in Germany, the US, India and other countries: The documentary addresses this and other issues from the 18 minute to 35 minute mark but the whole documentary is recommended viewing: <http://www.youtube.com/watch?v=pNvWia3dYCE>

It is clear that market interests are a strong priority for today's food safety agencies, however whilst on one level it may be convenient to biotech industry and world trade interest considerations to allow unlabelled soy onto the market in Australia, given that so many people are strongly and fundamentally opposed to genetically modified foods and do not wish to consume them due to dismissed or minimised health concerns, allowing GM soy to be sold in foods in Australia may actually have adverse impacts for market too, if such a move causes a major trend in people increasingly turning away from processed foods, as this would essentially be the only way to avoid unlabelled GM soy, given soy's aforementioned ubiquitous presence in the majority of processed food products. Similarly, many consumers increasingly wary of buying meat and animal produce raised on GM soy may turn away from the conventional meat produce market and seek organic or imported sources. Whilst this might actually be a beneficial trend for public health, given long unaddressed concerns raised by scientists regarding harmful additives and pesticide residues on produce, agencies underestimating the extent to which many Australians wish to avoid these foods could have considerable overlooked market repercussions. Quite

aside from such economic considerations, I believe however that safety agencies must somehow be restored in their function to primarily serving public and environmental health protection interests above political, industrial or corporate interests, as complex or challenging as this may have become for such agencies in recent years. With relevance to this issue and to the GM soy issue, researchers at the University of Canterbury very recently expressed concern over FSANZ failing to consider important concerns raised in their research relating to foods with dsRNA molecules, and the fact that FSANZ had accepted industry assurances instead of considering independent concerns. See: <http://www.inbi.canterbury.ac.nz/Documents/Press%20releases/media-statement-on-FSANZ-response.shtml>

Clause 3:1 of the proposal relating to lack of address of the issues of environmental releases of GM and the safety of animal feed is also concerning, as these issues have both shown problems already.

It is concerning that the FSANZ proposal states that 'No potential public health and safety concerns have been identified,' as the above scientist's paper is clearly just one example of many cases where concerns have been identified and expressed, though ignored.

The American Academy of Environmental Medicine also raised many serious concerns in a report, stating, "There is more than a casual association between GM foods and adverse health effects. There is causation as defined by Hill's Criteria in the areas of strength of association, consistency, specificity, biological gradient, and biological plausibility."<sup>5</sup> The strength of association and consistency between GM foods and disease is confirmed in several animal studies. Specificity of the association of GM foods and specific disease processes is also supported. Multiple animal studies show significant immune dysregulation, including upregulation of cytokines associated with asthma, allergy, and inflammation.<sup>6,11</sup> Animal studies also show altered structure and function of the liver, including altered lipid and carbohydrate metabolism as well as cellular changes that could lead to accelerated aging and possibly lead to the accumulation of reactive oxygen species (ROS).<sup>7,8,10</sup> Changes in the kidney, pancreas and spleen have also been documented." Note AAEM also cites lack of delivery of the promised benefits to date of these modifications. See: <http://www.aemonline.org/gmopost.html>

Both the health risks and environmental contamination issues demonstrate that GM is a huge scale experiment and it would be grossly irresponsible of governments to ignore the health risks raised by independent research, just as it is clearly wrong in a democracy to ignore the fact that the majority of people don't want GM. The fact that GM creates concerns for the environment that cannot simply be undone should also be given very serious consideration, yet is not. It seems insane to dismiss as non-existent such serious GM concerns, whilst at the same time our government will not permit garden plants sold in one state of Australia to cross for sale to the Western Australia, in consideration of risks for environmental contamination.

We often hear GM being promoted as a way to grow foods without pesticides, yet GM currently seems to involve either signing up for Round Up Ready or producing strains of crops that are pesticide resistant. The problem with this, other than the issue of further polluting an already over polluted environment, is that humans and nature are seemingly not pesticide resistant. A paper relating to BT cotton production in India contains research by Dr. Kreshav Kranthi addressing decreased yield, nutrient reduction in soil and increased need for pesticides and fertilisers in ensuing years after a seemingly promising start. [http://www.keine-gentechnik.de/fileadmin/pics/Informationsdienst/Schul-Seiten/fotos/2012\\_Coalition\\_GM\\_free\\_India\\_Bt\\_Cotton\\_Hype\\_False\\_Promises.pdf](http://www.keine-gentechnik.de/fileadmin/pics/Informationsdienst/Schul-Seiten/fotos/2012_Coalition_GM_free_India_Bt_Cotton_Hype_False_Promises.pdf)

We hear much about the noble aims of biotech companies to feed the starving. The documentary referenced above draws attention to this actually being a PR myth that relies on people's ignorance and

belief that GM can solve all the world's food production problems. Evidently not all countries with hunger problems are on board with this belief or at all happy about the prospect of solving such admittedly serious hunger problems by using genetic modification. An article from the Philippines describes a wish to protect their environments from corporate threats and to seek safe and environmentally friendly solutions to hunger challenges in the long term. Permaculture programs might work wonders for such nations if we lived in a world where such intelligent and genuinely caring solutions received mainstream funding. <http://bulatlat.com/main/2013/08/17/golden-rice-not-the-solution-to-vitamin-a-deficiency/>

Independent scientists have continued to express serious safety concerns regarding genetic modification of both foods and crops across the board. A small sample of the research by independent scientists raising safety concerns illustrates that safety claims made by biotech companies cannot be substantiated:

**'A long-term study on female mice fed on a genetically modified soybean: effects on liver ageing':** <http://link.springer.com/content/pdf/10.1007%2Fs00418-008-0476-x.pdf#page-2>

Regarding GM Soy, see also pages 51 & 52 (Conclusions) of the research paper co-authored by Carman and other Australian and U.S. scientists, **'A long-term toxicology study on pigs fed a combined genetically modified (GM) soy and GM maize diet,'** : <http://www.zoology.wisc.edu/faculty/por/pdfs/Carman.pdf>

'Complete Genes May Pass from Food to Human Blood,' 2013: <http://gmoevidence.com/wp-content/uploads/2013/08/journal.pone.0069805.pdf>

'Roundup disrupts male reproductive functions by triggering calcium-mediated cell death in rat testis and Sertoli cells.' <http://www.ncbi.nlm.nih.gov/pubmed/23820267>

**'Effect of diets containing genetically modified potatoes expressing *Galanthus niva* l i s lectin on rat small intestine,'** <http://stopogm.net/sites/stopogm.net/files/ewenpusztai.pdf>

The controversial GM potatoes research has been addressed by the global organisation, Physicians and Scientists For Responsible Application of Science and Technology. See: <http://www.psrast.org/pusztai.htm>

A 2012 study by French scientist Seralini and co- researchers **'Long term toxicity of a Roundup herbicide and a Roundup-tolerant genetically modified maize'** found early death and increased tumours in relation to mice fed GM maize. This is apparently the only study conducted on a longer term basis and caused a great deal of industry backlash over the shocking findings: <http://www.sciencedirect.com/science/article/pii/S0278691512005637> T

The head researcher Seralini answers his critics here: [http://gmoseralini.org/wp-content/uploads/2013/01/Seralinial-AnswersCritics-FCT\\_2013.pdf](http://gmoseralini.org/wp-content/uploads/2013/01/Seralinial-AnswersCritics-FCT_2013.pdf)

See also: <http://www.gmwatch.org/index.php/news/archive/2013/14882-seralini-validated-by-new-efsa-guidelines-on-long-term-gmo-experiments> .

The Discussions and Conclusions section of previous 2009 research by Seralini also raises serious concern: **'A Comparison of the Effects of Three GM Corn Varieties on Mammalian Health.'** <http://www.ijbs.com/v05p0706.htm>

A detailed article regarding a Danish farmers experiences with impacts of GM soy feed on his animals also features at this link: <http://www.gmwatch.org/latest-listing/1-news-items/13882>

All in all there seems to be a great deal of concern regarding the safety of GM soy and all forms of GM crops that would strongly suggest safety agencies should keep Australia free of GM.

Sincere regards,

H. Weir

My submission is submitted on 22nd August 2013 as a consumer. [REDACTED]  
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