standards management

From: standards.management@foodstandards.gov.au
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To: standards management
Subject: FSANZ: Applications and Submissions - Submission [SEC=INCONFIDENCE]

FOOD STANDARDS Australia New Zealand
Te Mana Kounga Kai – Ahitereiria me Aotearoa

FSANZ: Applications and Submissions - Submission

Sunday, 27 October, 2013

1. Assessment Report Number: A1085

2. Assessment Report Title: Food derived from Reduced Lignin Lucerne Line KK179

3. Organisation Name: Sonja Caraian

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12. Submission Text: I am strongly opposed to this Application to seek permission for food derived from genetically modified reduced lignin lucerne line KK179. I do not feel that the safety assessment report included with the application adequately addresses a number of concerns about GM foods. The report specifically states that it does not address either: a) “environmental risks related to the environmental release of GM plants used in food production”, or b) “the safety of animal feed or animals fed with feed derived from GM plants”. These are major issues which I feel should be rigorously addressed prior to the acceptance of this Application. Regarding a): while there is some debate about whether GM crops cause unintended harm to other organisms [1][2][3], until the potential risk of harm to non-target organisms is evaluated further I feel such crops should remain banned. Additionally, GM crops inherently lead to increased monoculture, threatening the biological diversity of our food supply and hence its robustness. Regarding b): As “lucerne is grown primarily for livestock feed”, according to the report, it is a major shortcoming that the safety report does not address “the safety of … animals fed with feed derived from GM plants”. There is thus no evidence that the crops are safe for the animals to which they are fed. In fact many studies, discussed below, have found that GM crops have a range of health risks for animals. However, the report does state that it addresses “food safety and nutritional issues associated with the GM line”, going on to detail the chemical composition of KK179. However it does not appear that any human studies have been carried out to assess the short or long term health implications of KK179. In the absence of specific data of this particular GM crop, other studies into the health implications of GM crops must be

relied on. In 2009, the American Academy of Environmental Medicine (AAEM) stated that, "Several animal studies indicate serious health risks associated with genetically modified (GM) food," including infertility and infant mortality [4][5][6][7][8], immune problems such as allergies [9][10][11][12], accelerated aging, faulty insulin regulation, and changes in major organs and the gastrointestinal system [13][14][15]. As such, the AAEM has asked physicians to advise all patients to avoid GM foods[16]. In summary, with this limited safety analysis it does not seem reasonable to draw the report's conclusion that "food derived from lucerne line KK179 is considered to be as safe for human consumption as food derived from conventional lucerne cultivars", and as such I feel that this Application should be rejected. [1] Transgenic pollen harms monarch larvae (Nature, Vol 399, No 6733, p 214, May 1999). [2] GM corn poses little threat to monarch (Nature Biotechnology, Vol 17, p 1154, Dec 1999). [3] Bt and the Monarch Butterfly: Update by Dr. Douglas Powell (AGCare Update Magazine http://www.agcare.org/AGCareUpdate.htm#Monarch). [4] I.V. Ermakova, "Diet with the Soya Modified by Gene EPSPS CP4 Leads to Anxiety and Aggression in Rats," 14th European Congress of Psychiatry. Nice, France, March 4-8, 2006; "Genetically modified soy affects posterity: Results of Russian scientists' studies," REGNUM, October 12, 2005; http://www.regnum.ru/english/526651.html [5] Irina Ermakova, "Experimental Evidence of GMO Hazards," Presentation at Scientists for a GM Free Europe, EU Parliament, Brussels, June 12, 2007 [6] L. Vecchio et al, "Ultrastructural Analysis of Testes from Mice Fed on Genetically Modified Soybean," European Journal of Histochemistry 48, no. 4 (Oct–Dec 2004):449–454. [7] Oliveri et al., "Temporary Depression of Transcription in Mouse Pre-implantion Embryos from Mice Fed on Genetically Modified Soybean," 48th Symposium of the Society for Histochemistry, Lake Maggiore (Italy), September 7–10, 2006. [8] Alberta Velimirov and Claudia Binter, "Biological effects of transgenic maize NK603xMON810 fed in long term reproduction studies in mice," Forschungsberichte der Sektion IV, Band 3/2008. [9] Mark Townsend, "Why soya is a hidden destroyer," Daily Express, March 12, 1999. [10] Hye-Yung Yum, Soo-Young Lee, Kyung-Eun Lee, Myung-Hyun Sohn, Kyu-Earn Kim, "Genetically Modified and Wild Soybeans: An immunologic comparison," Allergy and Asthma Proceedings 26, no. 3 (May–June 2005): 210-216(7). [11] A. Pusztai and S. Bardocz, "GMO in animal nutrition: potential benefits and risks," Chapter 17, Biology of Nutrition in Growing Animals, R. Mosenthin, J. Zentek and T. Zebrowska (Eds.) Elsevier, October 2005. [12] Hye-Yung Yum, Soo-Young Lee, Kyung-Eun Lee, Myung-Hyun Sohn, Kyu-Earn Kim, "Genetically Modified and Wild Soybeans: An immunologic comparison," Allergy and Asthma Proceedings 26, no. 3 (May–June 2005): 210-216(7). [13] Arpad Pusztai, "Can science give us the tools for recognizing possible health risks of GM food," Nutrition and Health, 2002, Vol 16 Pp 73-84 [14] Comments to ANZFA about Applications A346, A362 and A363 from the Food Legislation and Regulation Advisory Group (FLRAG) of the Public Health Association of Australia (PHAA) on behalf of the PHAA, "Food produced from glyphosate-tolerant canola line GT73," http://www.iher.org.au/ [15] M. Malatesta, C. Caporaloni, S. Gavaudan, M. B. Rocchi, S. Serafini, C. Tiberi, G. Gazzanelli, "Ultrastructural Morphometrical and Immunocytochemical Analyses of Hepatocyte Nuclei from Mice Fed on Genetically Modified Soybean," Cell Struct Funct. 27 (2002): 173–180. [16] See http://www.aaemonline.org/gmopost.html