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To whom it concerns,

The downside of designing a plant with a genetically modified plant is that only the strongest insects survive, resulting in a new class of superbugs resistant to both the crops' implanted toxins and spray-on chemicals. In 2011, scientists examined 13 major pests and found that five were immune to the poisons genetically bred into GM plants like Bt corn and Bt cotton. Similarly, farmers are battling ultra-hardy weeds which aren't responding to glyphosate—the herbicide marketed as Roundup. As a result, farmers are forced to use even more chemicals to combat these superweeds. According to the peer-reviewed journal Environmental Sciences Europe, GM crops cause herbicide use to increase by 25% per year.

Why are GMO producers allowed to grow their butterfly and bee-killing crops? Unfortunately, with the slurry of insecticides, fungicides, genetically modified crops, and high-powered weedkillers present in modern farming, it's hard to prove if GMOs are truly the variable to blame. Just as one study proves GM crops are the problem another study is released claiming they are totally safe. Meanwhile, honeybees continue to decline at a rate of 30% per year and butterfly populations have reached an all-time low. Although it's unclear whether GM crops are inherently bad for beneficial insects, they're at the very least perpetuating the widespread use of chemicals, which undoubtedly harms insects and the "weeds" they depend on (such as butterflies that lay their eggs on milkweed).

I, and I am sure most Australians, and global citizens don't want to eat genetically modified (GM) foods. All GM foods should be independently assessed for their health and environmental hazards and risks, be labelled as GM and be traceable. This will allow farmers, food producers, retailers, and shoppers to avoid them, for many important reasons.

I therefore strongly oppose changes to the Food Code that would allow a wide range of GM foods, made using novel methods that have a scant history of safe use, to be sold without safety assessment or labelling. These would include meat and milk from some genetically modified animals and substances like vanilla and stevia produced by genetically modified microbes in factory vats. These changes would undermine FSANZ's key responsibilities to ensure food safety and our right to know what is in our food.

Agrochemical companies cannot be trusted to self-assess the safety of GM foods as they have an appalling record of manipulating data to promote dangerous products.

Gene editing techniques have been found to make genetic changes that could never occur in nature and to result in widespread genetic damage that often goes undetected by GM developers.

I am deeply concerned that FSANZ has relied on advice from scientists with serious conflicts of interest, to conclude these new GM foods pose no greater risks than existing foods. Those seeking to commercialise GM plants, animals, and microbes should play no role in deciding how - or even whether - foods derived from them should be regulated.

The proposed changes would make Australia one of very few countries in the world to allow genetically modified animal products into our food chain with no regulation or labelling. This would put us at odds with our international trading partners, which FSANZ admits "may have a significant impact on trade". The Cartagena Protocol on Biosafety, an international agreement signed by 166 governments worldwide, and the UN's food standards body Codex Alimentarius agree that all GM techniques differ from conventional breeding and that pre-market safety assessments are essential before GM organisms are used in food.

I support expanding the definition for 'gene technology' so FSANZ continues to assess and regulate all

techniques and methods of genetic modification, other than conventional breeding. The proposal to deregulate new and emerging GM techniques and their food products, which pose new and unassessed risks, is completely unacceptable.

Thank you for taking my well-founded and informed concerns into consideration.

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