

Food Standards Australia New Zealand submissions@foodstandards.gov.au

Name: Sue David

[REDACTED]

Re: Application A1073 - Food derived from herbicide-tolerant soybean line DAS-44406-6

Dear FSANZ,

I continue to be baffled about why FSANZ has allowed any GM products into Australia. None to my knowledge have undergone adequate testing, with the latest application no exception. The history of GM is one of deceit and corruption. FSANZ follows USA guidelines which were created by the GM companies. Their executives went into the Clinton administration and created their own guidelines. Once doing this they returned to the GM companies to reap the rewards. I request that FSANZ actually takes time out and listens to those questioning GM rather than simply treat them as lunatic fringe. In WA I went to a seminar held by FSANZ and the OGTR. These organisations were so frightened of questions and open discussion that they only allowed pro GM speakers and questions. They obviously have so much to hide that they are unable to have open debate. I expect this latest GM crop will be allowed and letters such as this will be ignored, perhaps even laughed at, as the push is to encourage these GM companies continues.

The following outlines my concerns regarding this particular case. The opening paragraph is blunt, but it is time the public servants running FSANZ and the OGTR realise they are being paid by the people of Australia to represent their interests, not those of the US multinationals.

The real question is why even bother with GM:

- There is no consumer demand for GM foods.
- Labelling laws mean consumers do not know they are eating GM foods - if they did they would not buy them.
- Consumers pay a premium for organic food - one of the top 5 growth industries in Australia. Note GM food does not rate as no demand.
- Food contaminated by GM gets lower prices. In WA GM is already contaminating roadways and farms and growers are losing money
- Insurance companies are now starting to cost in the GM factor, so regular growers are having to pay for this GM push in agriculture.

I ask that FSANZ withdraw the application A1073 until the requisite safety tests have been conducted. As a consumer I need to know if the GM DAS 4406-6 will be safe for my family to eat. I am highly concerned that you have been misleading in saying that you have fully assessed, along the best scientific grounds, the safety of this food. I now know that there are no feeding studies conducted on the soybean or any components of the whole food. Without this information there is no way that FSANZ can carry out its risk assessment on A1073.

I note that Food Standards Australia New Zealand (FSANZ) values and responsibilities are to protect, the health and safety of people in Australasia and New Zealand through the maintenance of a safe food supply using the best available sciences and evidence to guide decision making and being responsive to the issues raised by others, to enable better consumer choice by undertaking dietary exposure modeling and scientific risk assessments on GM foods.

Based on a reading of the assessments on A1073 that are provided on your website I believe that you have fallen short of your duty of care in relation to this application. The soybean line contains novel genes that have never been considered by FSANZ.

- FSANZ has not followed its legislated, Codex or OECD guidelines for risk assessment over significant changes of nutrient, protein, carbohydrates and anti nutrients in A1073.

- Applicant information provided on safety is insufficient for assessment & approval into the food chain.

- There have been no feeding studies to show if there is risk from novel DNA or pesticides applied to the whole soybean, A1073 (DAS 44406-6 event).

- There is a lack of scientific data necessary to protect and maintain a safe food supply for the health and safety of people in Australia and New Zealand.

- The reliance on the applicant's data has not shown impartiality, openness and accountability.

- FSANZ has not provided information to consumers that will enable better consumer choice.

Over the last year there have been some highly concerning studies published in relation to safety, (Seralini. G-E., Clair. E., Mesnage. R., Gress. S., Defarge. N., Malatesta. M., Hennequin. D. and de Vendomois. JS. (2012) Long term toxicity of a Roundup herbicide and a Roundup-tolerant genetically modified maize. Food and Chemical Toxicity Vol: 50, (11) 4221–4231) that highlight the potential of real danger from A1073 components. PLEASE DO NOT IGNORE THESE STUDIES. TYPICALLY FSANZ DENEGRATES EVERY STUDY EXCEPT THOSE SUBMITTED BY GM COMPANIES WHICH IS QUITE STRANGE. THEIR ARGUMENTS ALSO MIRROR THE GM COMPANIES. COUNTERARGUMENTS ARE BELITTLED AND IGNORED.

The decision to allow any GM crops into Australia "takes my breath away". There is so much literature and science showing serious problems and yet the precautionary principle is thrown away. So many Australians are concerned about this and have spend a lot of time and effort trying to get FSANZ and the OGTR to question what they are doing. I just wonder how much more needs to go wrong for these organisations to listen.

Yours sincerely,  
Sue David  
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