

Bayer, CropScience and Syngenta Seeds

[Application A1081 – Food derived from herbicide-tolerant soybean line SYHT0H2.](#)

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To the FSANZ,

This application for soy is complicated due to the doubling up of biotech processes. In light of the current research for the existing GE crops the application must ring warning bells for the approval process. Glufosinate-Ammonium and Mesotrione are both hazardous chemicals and the effects of consuming these pesticide in food or residues are not clear and should be investigated thoroughly before approval is given- ie double blind randomised control trials.

The insects and microbes (and weeds) build up a tolerance to pesticides and they become useless therefore this technology is not sustainable and attempts to take away the natural abundant, fertile process in nature.

Evidence that GE crops are safe to eat

“The FSANZ safety assessment found no public health or safety concerns and food from this soybean line is as safe for human consumption as food derived from conventional soybean.

However, current GE research has flaws and studies tend to have low sample numbers, are short term (<3 months), they do not consider gross organ anatomy, they do not look at the whole foods but animal feed that is fed to livestock- which has little bearing or relation to human health, statistical data is cherry picked and missing from the published data are the many failed crops and studies that show problems.

There are no long term double blind randomised controlled human trials, yet you claim biotech crops are safe- please back this up. People don't want to eat GE crops and opposition is growing regardless of science opinion, we should have the right to not participate in this experiment- that is why there are more people speaking up. The power of the biotech lobby is so strong our governments are powerless and do not stand up for the people, and the regulators just rubber stamp applications without even looking at the study. The process is obviously wrong and not set up to protect human health.

Do consumers want to eat GE food?

There is growing opposition and many countries oppose the technology and are rejecting it, eg Butan (these countries will have and financial advantage from this approach). There has been massive worldwide protests and more are coming next month- TAKE NOTE! People oppose the technology.

Sprays on biotech crops

There is growing strong science that shows the damage pesticide residues can have on people and animals. Toxins load the liver are really are not supposed to be consumed we are organic beings and need life bacteria in our guts for healthy plants which haven't been sprayed to 'death'.

Pesticides and fertilizers are running into the ocean in massive amounts lately adding to the acidification of the ocean, effecting marine life, coral reefs etc. This too will effect the rain and thus effect crops.

Are GE crops different?

If you change the DNA you change the proteins! Genetic changes to DNA can effect proteins including those that check DNA integrity, or turn on and off genes. Therefore by changing DNA- the result is changed protein expression.

This should have been investigated before any crops were let loose on our landscapes, and human and animal populations.

This research is missing from the biotech lobby and they actually claim their product is the same as conventional crops- however the simple corollary above disproves that- GE crops are not the same as conventional breeding, change= change.

Also if biotech techniques result in the same crops- than why bother? Oh- it is for the company's financial gain in more seed purchases and pesticide spray.

So if the only benefit is for the biotech company and no proven human safety trials exist- THIS EXPERIMENT SHOULD BE STOPPED- by the ethics committee of the people!

Agricultural land monopoly- feeding the globe

However, the regulatory has the power to protect and uphold the rigorous scientific assessment of risk to public health and safety and must be charged to stand up for the health of the food supply and reduce the monopoly stranglehold that this industry has on agricultural land worldwide, the regulators and governments. This industry monopolizes land- including land that was previously of high nutrient quality with subsistent farms that were feeding villages in the Third World. This third world land is now covered with GE mono-crops for the first world. In fact it is the Biotech companies that have caused this displacement and loss of food security- feed the world stop biotech crops taking land in these poorer countries.

If we want to continue to feed the world- the focus must change to sustainable food security instead of taking from the land and leaving it barren. The future must include community gardens biodynamic principles of feeding the soil, composting and allowing fallow fields.

This will allow the globe to rebuild the land high quality soils, fed with natural manures not artificial fertilizers. Biodynamics can bring the microbes back over time and perform soil restoration, this is widely understood and used worldwide- they just don't have government support or money. In contrast the biotech industry has a massive budget and a strong hold on the world's governments,

universities, seed supply and more marketing than they need. We don't need to pander biotech giants and the poor quality research anymore- it is not sustainable.

If biotech is really interested in feeding the world use the multi-millions to grow food that has no pesticides or genetic changes- (10odd years ago we did used to have all the seeds we needed)- you don't need to waste time and money just grow clean food- than we could all eat free or guilt, cancers, allergies, organ damage reproduction problems, novel disease outbreaks, etc???

This Mickey Mouse science is losing favour fast- try looking into feeding the soils natural fertilizers and without mono-crops beneficial insects control pests thus you don't need pesticides.

Therefore, instead of some high tech costly solution: STOP PUSHING THIS UNTESTED TECHNOLOGY ON THE WORLD. I look forward to receiving some HIGH QUALITY evidence to justify your position.

Recent studies

Studies are now suggesting that biotech foods effect the kidneys, liver, reproductive organs and gut integrity in animals (Judy Carman et al 2013). It is possible that biotechnology is responsible for the novel microbes that are now crossing species barrier; SARS, Hendra etc ([Louz D.](#) et al 2005)

We don't want to eat food that is genetically changed as the proteins are obviously changed. If you don't believe that then you have little knowledge of microbiology. The DNA makes proteins thus a change in DNA changes the protein with unknown effects on proteins that check DNA integrity, or turn on and off genes. Therefore by changing DNA the result is changed protein expression. Thus research is required into what effects the changed proteins have on animals, insects and humans consuming them. This appears to be missing from the data set. I am not sure a marketing- money making business has much knowledge about pure science, which has been pushed aside for ego driven biotech. What ever happened to observation and theory testing- instead of hypothesis that irrevocably changes the world's food supply?

1) One theory to test what effect does GE food have on those that consume it? Instead of hypothesis that irrevocably changes the world's food supply

2) What effect on the environment including plants animals, insects soil does GE crops have?

Again both these have possible negative outcomes thus passing ethics committee is complicated.

Therefore it is unethical to put this technology into the food supply when it had not been thoroughly tested.

Due to the increasing evidence of problems occurring with animal studies and lack of evidence or no gold standard evidence to prove there are no problems with humans or animals consuming GE food, all approved GE application in Australia should be suspended and no further application granted and finally a precautionary approach is what should have been taken in the beginning before the genie was let out of the bottle and must be taken now. The consumers are demanding it, and legal liability threatens the industry and the regulators who have superficially considered the evidence from the GE companies and leant towards biotech industry facilitation, which suggests little or no impartiality

or more clearly a bias to allow GE applications with little real scrutiny. The Food authority regulator is following this path to its peril.

When these products have not gone through gold standard research they only prove that altered DNA crops can be produced and grown not that it is safe for the environment, animals, insects, microbes and humans.

Labelling

We want to eat un-tampered food. Unfortunately the industry takes that away from us too, as products do not advertise the great GE products in their foods- why is that? Is it because there is no advantage to the consumer? In fact there are possible insults to humans, insects and animals consuming the technology.

Can you let me know the high quality data- which is only long term double blind randomised control trials on humans with large data sets (including gross organ anatomy)? No? Is that because the basis of the technology is not based on high quality research or that it would not make it through an ethics committee due to the potential risk, insult or injury? If this is the case then why is it in our food supply?

Biotech companies should take seriously the risk of legal damage for forcing this low quality food stuffs on the globe.

FSANZ urgent action

I urge the regulator to err on the side of caution for the irrevocably effects on the human race and environment that GE crops pose are becoming uncovered.

I have not gone into too much detail about this specific application however the above demonstrates more flaws and lack of strength of the biotech industry research overall which must be addressed before we lose all opportunities to market as 'GE free products' that are receiving a premium over GE crops and farmers may get stranded with a products that does not sell as the world turns its back on the technology.

It is urgent to separate GE crops thus we need separate harvesters and clear labelling to increase chances of traceability in cases or injury and for customers to know and choose accordingly.

The stray GE wheat found in a field recently in USA (which was not approved due to falling consumer sentiment) is an example or the need for tighter control.

I believe this mysterious escape of GE wheat in USA demonstrates the massive issues with the technology. Nature is the boss here; DNA is not containable in the environment. Thus biotech products threaten other industries that are not into changing the genetic structure for some agricultural financial advantage

Do not fail to uphold the rigorous scientific assessment of risk to public health and safety. Reject this application and reconsider those already approved. With more time I can assist in this changed focus for Australia with ideas to transform and ensure a stable sustainable food supply.

Judy A. Carman et al' 2013. **A long-term toxicology study on pigs fed a combined genetically modified (GM) soy and GM maize diet**', <http://www.organic-systems.org/journal/81/8106.pdf>

[Louz D](#), [Bergmans HE](#), [Loos BP](#), [Hoeben RC](#)., 'Cross-species transfer of viruses: implications for the use of viral vectors in biomedical research, gene therapy and as live-virus vaccines.' [J Gene Med](#). 2005 Oct;7(10):1263-74.