

## submissions

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**From:** janet grogan [REDACTED]  
**Sent:** Sunday, 27 April 2014 7:57 PM  
**To:** submissions  
**Subject:** Submission: A1094 Food derived from Herbicide-tolerant Cotton Line DAS-81910-7

Submission: A1094 Food derived from Herbicide-tolerant Cotton Line DAS-81910-7

I, Janet Grogan, on behalf of FOODwatch WA, would like to make a submission in relation to the Application A1094, Dow Chemical's GM cotton genetically engineered to tolerate (absorb) the herbicides 2, 4-D and glufosinate ammonium.

Almost two decades ago Roundup Ready crops were released into the environment with the belief that their resistance to the chemical glyphosate would allow farmers to control and eliminate weeds; that this would lead to less chemical use, and therefore a safer environment and food product for all.

We now realise that this has not eventuated. Instead we see a massive rise in weeds (1) that have developed resistance to glyphosate; an increase in the amount of glyphosate usage (2); and communities suffering from continual use of this chemical (3).

As a response to this man-made problem we are now seeing genetically modified crops being developed to be resistant to another more toxic chemical: 2, 4-D.

We are very concerned about this application and would like to see it refused for the following reasons:

- 2, 4-D (2, 4-dichlorophenoxyacetic acid), is a component of "Agent Orange," the toxic defoliant used in Vietnam.
- 2,4-D and other herbicides of its class have been independently associated with deadly immune system cancers, Parkinson's disease, endocrine disruption, and reproductive problems (4).
- This crop has been engineered to survive repeated sprayings with this highly toxic chemical.
- The use of 'substantially equivalent' values is not a scientific measure and should not be used to quantify the safety of any GM crop (5).

- The majority of a cotton crop will end up in the food chain as either animal feed or cotton-seed oil and therefore needs to be assessed using long-term, generational feeding studies before we and stock are unknowingly exposed to long-term, generational consumption of such GMOs.
- While compositional analyses may have their uses in evaluating certain parameters of GM foods it should not be at the expense of using animal feeding studies where the whole product is used rather than isolated proteins.
- The introduction of glyphosate resistant crops has seen an increase in the use of glyphosate and an increase in weeds resistant to the chemical and it is expected that we shall see the same outcome with 2,4-D.
- Will we then see crops resistant to both glyphosate and 2, 4-D? In which case what harsher chemicals will this lead farmers to resort to?
- The overuse of GM glyphosate resistant crops has led to an increase in the maximum residue levels in these crops. Will we be expected to tolerate similar increases in 2, 4-D sprayed crops (6)?
- There will be no meaningful labelling to alert the purchaser of animal feed, or GM cotton-seed oil, or animal products from GM cotton fed animals that the product has been derived from the Cotton Line DAS-81910-7

As a member of the GM-Free Australia Alliance, FOODwatch believes that there should be a 'GM Freeze'.

"GM Freeze means: no new GM foods, no new GM crop approvals and no new GM crop growing areas. During the GM freeze, the safety GM foods on sale in Australia must be re-assessed and data on yield, pesticide use and effects on biodiversity of GM crops in Australia must be publicly investigated."

<http://www.gmfreeaustralia.org.au/gm-freeze>

Janet Grogan

FOODwatch

[www.foodwatch.net.au](http://www.foodwatch.net.au)

(1) <http://www.enn.com/pollution/article/40723>

(2) <http://www.i-sis.org.uk/GMcropsIncreasedHerbicide.php>

(3) <http://www.organicbuenosaires.com/2012/06/25/gmo-pesticides-birth-defects-argentina/>

(4) <http://www.pan-uk.org/pestnews/Actives/24d.htm>

(5) <http://www.i-sis.org.uk/subst.php>

(6) <http://www.gmwatch.org/latest-listing/1-news-items/13674-monsanto-wants-glyphosate-residues-in-food-to-rise>

