Tuesday 10th February, 2009

Dear Mr Redman,

I would like to thank you for giving our group, which represents the Network of Consumers for GM Free Food, the opportunity to speak with you today.

As you are aware the Network has, in one form or another, been involved in a long campaign to maintain the GM free status of Western Australia.

Our concerns are that we are exposing our state, our citizens, and the future health of WA to a relatively new technology that has not been thoroughly tested to ascertain its safety in the field and as part of the food chain.

We have used many avenues to have our concerns heard and acknowledged. As you know we have submitted petitions, postcards, personal letters and emails, as well as making phone calls, lobbying and rallying. We have had the support of respected members of the community, non-government agencies, politicians, and ordinary members of the community from all walks of life, young and old.

We believe that we represent the majority of people in WA. Recent polls show that 90% of consumers would like all GM derived foods labelled. This figure cannot be ignored, and it is reflective of a growing concern that people have toward the safety of GM foods.

The government's December 23rd decision to allow 1000ha of GM canola to be grown across the wheat belt at 20 locations has dismayed us.

We had hoped that the imminent release of the Industry reference paper on GM canola would be part of the decision process, as we had hoped the Cotton report would. It now appears that the decisions to allow GM cotton, and now GM canola trials, have been taken without consulting either of these two reports.

Contrary to your statement that "The decision follows a long consultative process with industry, the public, local government, and overseas experience" we feel that this has not been the case.

The government is relatively new, and has not had time to be involved in 'long consultative processes'. We feel that we, the members of the public, have had no say in the process, and nor has local government (1). I am puzzled as to which overseas experience is being referred to as many countries, which have had GM trials and restricted commercial crops such as France, have reversed their decisions on GM (2). The Consumers Union of Japan has lobbied our state government to maintain a GM free supply of canola. Japan is our largest customer. It was explained to me that one of the reasons that GM free canola is sought after is because of the cold-press method of oil extraction. Heat is not used to extract the oil, and this means that the DNA content of the oil is likely to remain intact as it is not broken down by high temperatures(3). This is supposedly unlike the production of GM canola oil and GM cottonseed oil that is used, unlabelled and untested, in Australia.

We, therefore, have to ask how was the decision made, and what was it based on?

Our observations and concerns

Prior to the election the National party had a policy which supported non-food GM crops only (4).

Prior to the election the Liberals had a GM policy paper available on their website "GM Technology For Plants In Agriculture. The Way Forward".
This paper was written by Bill Crabtree, who refers to himself as an 'Agricultural Consultant'. It has now become known that Crabtree is the Managing Director of Green Blueprint International, a Biotech company which has the rights to a GM salt tolerant wheat (5).

The Liberal's GM paper has a small section dedicated to 'Health Issues'. It reads

"There is some community concern, fuelled by the state Labor Government, that GM foods might not be as safe as conventionally bred foods. This contradicts scientific evidence generated by all of the world's leading authorities on food, genetics and breeding. These include government agencies, universities, and independent and private research institutions.

In 2001 an EU commissioned report into the safety of GMs was concluded at a total cost of $US65 million. The study consisted of 81 research projects conducted by 400 research groups over 15 years and confirmed the safety of GM crops (6). One survey of the literature listed over 140 animal feeding trials".

Of the 81 research projects listed very few were related to the safety of GM foods, and the only one that was relevant (looking at GM DNA transfer in the human gut) had not been completed at that time (although it has been since) (7).
Other studies that were of relevance showed conclusions such as
a) GM pollen travelling 100 metres
b) High expression of GM plant proteins could adversely affect beneficial insects' behaviour and physiology: more work was suggested.
c) Possible hazards from Bt-plants for the biodiversity of non-target insects: study was incomplete.
d) There was a potential problem of the accumulation of Bt toxins in the environment, especially in the residues of transgenic organisms (particularly plants).
e) There was the potential of natural gene transfer processes to mediate horizontal spread of genetic material at a low, but nevertheless present level in genetically modified lactococci.

It has been noted that the website that your office has referred people to when querying the safety of GM technology is not what it seems. It purports to be a list of 67 independent studies. There is only one GM canola study, which concludes that weight and thyroid problems resulted from the feeding trial. The canola was a different variety to the one proposed for the WA trials.

MADGE researcher Madeleine Love detailed the contents of the list and stated:

""This isn't a list of studies showing GM food is safe – it's a random collection on the general topic. A number of the studies report adverse findings….This list appears to have to been used to create the impression that GM canola has been independently determined to be safe". The list was compiled by GM advocate Dr David Tribe (8).

In August 2007 the then Agriculture Minister, Kim Chance, answered a call for the government to consider lifting its GM ban in the light of compelling evidence that the technology was safe. Mr Chance responded

"If the states are not happy with the way in which consumers are responding to GM technology, they need to ask why. The key concern that is expressed by consumers is that they are not certain about the health impacts of GM technology. They have not seen the animal feeding trials. When I raised this issue in this house previously, I was sent references to 137 published animal feeding trials. We went through every one of those 137 references. It was a very time-consuming process. However, not one of those 137 concerned a long-term animal feeding trial that was dedicated to assessing mortality and morbidity in the animals subject to the feeding trial - not one. Some of the 137 trials lasted a few weeks. Most of them were comparisons between GM corn, for example, and non-GM corn, based on specific economic parameters, such as the growth rate of breast meat in chickens. Some dealt with mortality, and a few dealt with the question of morbidity. Even fewer weighed critical organs post-mortem, yet that is the basic thing that needs to be done in an animal feeding trial before we can convince consumers that GM technology is safe" (9).

Other trials and reports have been ignored or have been selectively referred to, such as The Industry Reference Group papers. The Group was set up 'To identify logistical, agronomic and marketing issues relevant to the use of biotechnology in agricultural crops in Western Australia'.

The Reference Group examined many issues relating to production and use of GM crops and Biotechnology. The GM cotton paper was released for feedback mid 2007 and the GM canola report has yet to be released for comment. The report is expected to highlight doubts on the much vaunted agronomic and economic success of GM (10)

The cotton report was open for public submissions and the "Summary assessment of submissions" confirms that the majority of respondents (almost 90%) were in favour of the moratorium remaining. (See attachment).

Many issues such as unknown environmental and or health effects, toxin residues and insect resistance have yet to be addressed. It should be noted that recent reports have shown that target pests have been surviving the Bt toxin in GM cotton plants (11) which legitimises one of the submitted concerns.

It is also worth noting that 'water use efficiency' was recorded as a reason for the moratorium to be lifted (a point used by 38% of this group including the National party) when, in fact, the cotton crop was not genetically engineered to be less thirsty. This trait existed in a non GM version before it was genetically altered to be pest resistant (12).

The safety of GM cotton products in the food chain has not been assessed. Agrifood Awareness directs concerned members of the public to the Animal Biotechnology

website to allay concerns about GM fed animals (13). Again this website is not wholly concerned with animal feeding trials and GM safety. The only feeding trial which I was able to find related to GM corn and the report states

“Researchers weren't concerned the genetically modified corn would cause damage to the livestock's health, but did want to see if the corn would affect the way the livestock developed, Erickson said” (14)

Incidentally this report (posted in 2003) concluded that GM feed did not affect meat production. A recent report has been released which refutes this.

“Studies in Germany and the USA by farmers themselves have shown that animals raised on non-GM feed produce better quality and a higher quantity of meat than animals fed on genetically modified feed. The same studies reported health problems, such as stomach ulcers, found in the animals fed on GM feed” (15). As most GM crops are used as animal feed this would have economic implications for farmers.

Independent studies have also found similar internal problems with GM fed animals (16).

There is a need for generational studies to be conducted as research is now pointing to the consequences of GM diets becoming more problematic in succeeding generations. The thriving of a single generation on a diet is no guarantee that it is a satisfactory one. Its effects may become apparent only after the passing of several generations when the animals suddenly cease to conceive so often, and give birth to stunted and short-lived litter. Finally complete sterility may occur (17).

As a consumers’ group we are concerned with the safety of our food. The information presently available leads us to believe that more independent, in depth, generational studies are necessary to determine the safety of GM foods.

In 2000 a GM conference was held in Edinburgh involving over 400 scientists, regulators, industry and non industry organisations. It reported:

***‘****The assessment of GM food safety*

There remains uncertainty about the potential long-term effects of GM food on human health and on worker safety.

The assessment of the safety of any novel foods, including GM food, involves a variety of kinds of evidence. One commonly used tool is the concept of “substantial equivalence”. The essence of this idea is that a comparison between the novel food and one already in the diet provides the basis for asking questions about the safety of the novel product. Substantial equivalence is not a quantitative criterion or a hurdle, but a framework for thinking. It is continually modified and updated, but it is timely now, after six years of using the tool, to undertake a more detailed review. On two more technical issues: *i)* there is no clear agreement about the importance of animal feeding trials (other than toxicity trials) in assessing the safety of novel foods, including GM foods; and *ii)* the methods for testing toxicity and allergenicity of GM foods need re-examination. Existing international bodies are working to achieve consistent standards and criteria for the assessment of food safety, and this is to be

applauded. The “precautionary principle” is now beginning to be discussed internationally in relation to food safety, but it has not yet been translated into an agreed operational form (18).

Unfortunately ‘substantial equivalence’ is still used as a measure of GM food safety and there are no universally accepted rules on feeding trials. The precautionary principle is not universally adhered to.

Dr Judy Carman of the Institute of Health and Environmental Research in Adelaide has stated “ There are no animal tests for allergy, no animal tests for reproductive problems, no animal tests required for any damage to organs for example from long-term consumption of the food. And these really do need to be done”.

We are repeatedly told that billions of GM meals have been eaten and as there have been no perceived adverse reactions this must mean that GM foods are safe (19). Our concern is that the apparent absence of evidence does not mean that there is none.

Dr. Judy Carman confirms this fear when she observes

“Without full animal testing, we don’t even know which diseases to look for in people …..Consequently, we are likely to be unaware of any problem until a critical mass of clinicians begins to individually recognise that they have been seeing a lot of syndrome X, start asking their colleagues if they have seen the same, and push for an investigation” (20).

In order to determine if someone may react to a particular product one has to see if they have been exposed. If GM food is not labelled, there is no traceability and how can patterns be detected? The labelling of GM foods allows for consumer choice and traceability (21).

We do not have faith in the government body (FSANZ) that has been set up to determine the safety of GM foods, and we are pleased that we are supported by some areas of government (22).

The labelling laws are very weak and allow for the majority of GM derived foods to go unlabelled. This is a Federal Government issue, but we understand that the state government will be setting up an intergovernmental committee to look into this (23).

In 2006 the then shadow agriculture minister, Gary Snooke, said in reference to the Liberal party’s GM policy “The policy appears to be based on science and not emotion” (24).
One has to ask whose ‘science‘was he referring to?

Further to our concerns on the safety of GM crops is what will happen to the trail product. Will it be used as animal feed (hay and or seed) and crushed for oil? None of these would have to be labelled under the current laws. The state government’s encouragement for consumers to “Buy West, Eat Best” could be fraught with problems once home-grown GM canola enters the food chain.

We are aware that some farming groups see the adoption of GM technology as an opportunity to increase their profitability and options.

After an historically productive non GM canola harvest in 2008 it seems ironic that some WA farmers would risk the marketability of their product and invest in a crop that markets do not want to buy and consumers do not want to eat.

Thank you for your time,

Janet Grogan

Network of Consumers for GM Free Food


(1) http://www.countryman.com.au/article/2095.html

(2) http://www.agbios.com/main.php?action=ShowNewsItem&id=8827

(3) http://www.foodlegal.com.au/bulletin/article/2008-6/why_australian_consumers_are_eating_gm_food_without_knowing_it/

(4) http://www.afaa.com.au/news/n_news-2085.asp

(5) http://www.non-gm-farmers.com/news_details.asp?ID=2854

(6) http://ec.europa.eu/research/quality-of-life/gmo/index.html

(7) http://www.mindfully.org/GE/2005/DNA-Transfer-To-Gut1jul05.htm

(8) http://gmopundit.blogspot.com/2007/06/150-published-safety-assessments-on-gm.html

(9) http://www.parliament.wa.gov.au/hansard/hans35.nsf/NFS/56167df8357d5708c8257391002f9cf4

(10) http://news.smh.com.au/national/gm-crops-could-divide-communities-20081223-744s.html

(11) http://fw.farmonline.com.au/news/nationalrural/cotton/general/gm-cotton-under-investigation-in-queensland/1408255.aspx?src=enews

(12) http://www.ogawa.org.au/GMO.html

(13) http://www.animalbiotechnology.org/

(14) http://www.animalbiotechnology.org/dom_policy.asp?news_id=933&mode=showarticle&show=false

(15) http://www.walesonline.co.uk/countryside-farming-news/country-farming-columnists/2008/12/16/gm-feed-is-not-the-answer-for-our-animals-91466-22483001/

(16) http://www.organicworks.com.au/GMHealthrisks.htm

(17) http://www.i-sis.org.uk/GM_Soya_Fed_Rats.php

(18) http://www.oecd.org/dataoecd/34/30/2097312.pdf

(19) http://www.theage.com.au/articles/2003/07/16/1058035064906.html

(20) http://www.gefreeaustralia.org/images/JUDY-download.pdf

(21) http://members.ozemail.com.au/~judycarman/Submission%20to%20FSANZ%20re%20GE%20food%20labelling%20review.htm

(22) http://rachel-siewert.greensmps.org.au/content/media-release/fsanz-fails-gm-labelling

(23) http://www.mediastatements.wa.gov.au/Lists/Statements/DispForm.aspx?ID=131093

http://www.ausfoodnews.com.au/2008/06/03/wa-government-calls-for-a-halt-to-gm-food-approvals.html

(24) http://fw.farmonline.com.au/news/state/agribusiness-and-general/general/liberals-throw-down-gauntlet-over-gm-moratorium/12184.aspx?storypage=3