

via email to Gene.Technology.Review@health.gov.au

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Gene Technology Review
Department of Health
CANBERRA ACT 2601

Dear Review team:

Thank you for accepting comments from stakeholders (consumers) regarding the above review. I do hope that comments which do not support your obvious push towards the increased infiltration of GMO's will be read and seriously considered. Too often government conducts these consultations just to 'tick the box' without ever considering what residents and stakeholders actually have to say. Since this consultation is talking about the food supply and the deliberate deception of the public that you have allowed corporations to do, I certainly hope you will be paying attention!

This submission is actually a personal one although I will also draw from my extensive knowledge of amphibian decline from my 23 years of active frog conservation in two states, as well as my 19 years of running the 'frog hospital'. Indeed, I have been awarded twice by government for my volunteer contribution to detecting amphibian health problems as well as awards from NGO's. While gene technology does not seem to have any relevance to the decline of frog populations, it absolutely does as it is yet another pollutant creating excessive chemical runoff into our waterways and air (via aerial spraying) and it is assisting the decline of insect populations which is what frogs survive on.

ToR: 1) current developments and techniques, as well as extensions and advancements in gene technology to ensure the Scheme can accommodate continued technological development.

I'd like to borrow a line from the first Jurassic Park movie: "*Just because your scientists COULD doesn't mean they SHOULD*". (In case you don't remember the line, the mathematician Ian Malcolm says it to entrepreneur dino-resurrector John Hammond in the dinner scene.) Your ToR makes no mention of whether gene technology has ever been reviewed for damages or performance outcomes – only that it needs to be allowed to expand!

Technology has taken the planet far but it has put humanity on a suicidal path. The entire planet is now fully and completely contaminated (even at the poles and highest mountain peaks) because of "advances" in chemical use, metal and plastic nano-particles, mining and RF's / EMF's. Climate is now totally chaotic, seemingly unpredictable and deliberately disturbed to the extreme because of the use of technology (e.g., stratospheric injection, ocean fertilisation, HAARP, etc.) to allegedly 'manage' specific weather processes. Human lifespan is now starting to retract due to exponentially-rising chronic disease problems at levels that will actually lead to our extinction in probably a 100 years or less - UNLESS we start walking backwards from the so-called "progress" that has got us into all this trouble. The ability of the earth to support life is now in serious jeopardy and the 'sixth extinction' has already started. The Australian government – by fully supporting the "corporate profit model" over all else ("business at all costs") is facilitating the erosion of ecosystem services and driving biodiversity loss. Your support of gene technology is part of that 'road to ruin'.

How can a technology that functions by shooting genes with a 'gun' into a different species in a haphazard fashion with no regard for the consequences be considered an "advanced" technology and why would anyone with intelligence support such a practice? Since when did human beings develop such an arrogance about life that this sort of behaviour is not only tolerated, it is encouraged to expand? As if GMO's haven't gone too far already (they have), now biotech's are venturing into CRISPR technology where genes themselves are being edited – again with no

regard for the consequences of epigenetics. It all sounds to me like playing God while on crystal meth! It reminds me of another line from a famous film: "who is the worse: the fool - or the fool who follows him?" (said by Obiwan Kenobe in the original Star Wars film). GMO production is one such reckless behaviour that you as a government are supposed to protect your citizens from.

GMO's are not the right direction to go when it comes to both environment and human health. The crops deemed 'roundup-resistant' will not grow without repeated applications of glyphosate which is a carcinogen. (This is yet another reason why seagrass beds and kelp forests around Australia are declining and subsequently the species that depend on them.) Glyphosate is systemic and DOES affect people through the shikimate pathway in the gut – everyone who eats Roundup-ready crops is eating a carcinogen. Why do you support that?

The Bt versions of GMO's include a bacteria that creates its own insecticide which not only kills insects (including the critical pollinator bees) but also eats holes in the intestinal tract of humans. The run-off from both of these types of crops needs to be kept out of catchments which feed into the Barrier Reef lagoon. You've made promises to UNESCO about proper custodianship of the Barrier Reef (which is critical for biosphere support) but your actions (or lack of them when needed) is really just smoke and mirrors. At the very least, GMO's need to be banned from any catchment flowing out to a coral reef system.

Australia needs to do an abrupt about-face about this technology. We need to emulate the 'smarts' of other countries such as those in Europe who have banned GMO's, much to their credit and the better health of their citizens. Regardless of how many submissions you might receive from stakeholders like me who refuse to go down the slippery slope of GMO consumption, I fear that you will still continue to promote the corporate profit model and side with biotech lobbyists over the rights and health of your own citizens. So to acknowledge that possibility, I would like to stress that serious controls need to be applied to this technology to stop its harm to the public, harm to farmers and harms to the environment. GMO's are 'deliberate mutants' and, at the very least, they need to be grown in warehouses so that they are quarantined from all non-GMO life. If that is too difficult a logistical requirement, then GMO's should not be grown at all.

Farmers that grow 'traditional' crops and those who farm organically have the same rights to do business as anybody else (in fact, the organic market is growing because consumers are tired of being poisoned by the food supply) but their properties are being contaminated by these 'fake' crops. However, the playing field when it comes to GMO farming is very clearly biased against those who aren't growing GMO's. Why is this industry handled differently to other pollutants? If my neighbour next door ran his car through my front door or sprayed sarin gas in the direction of my house, authorities would put a stop to it fast. Why is this not the case with GMO's? Contaminated seed encroaches onto other farms (and cases in the USA have proven that this contamination can be over huge distances) and not only disrupts that farmer's ability to do business, the poor victim is often taken to court (e.g., Marsh vs. Baxter, WA May 2016), goes broke from the litigation costs, or is forced into growing GMO's against their will. (Obviously some corporations are more equal than others) This kind of intimidation is not how a legitimate company increases their business – this is how criminals do business. Why is the Australian government supporting this?

Has the Australian government's gene technology policy protected Australian farmers from aggressive foreign biotechs? No, it obviously hasn't. Now that the true nature of glyphosate is common knowledge, has the Australian government moved to protect millions of its citizens and the environment from this carcinogen? Not yet. How about the neonicotinoids which are required for growing Bt-impregnated GMO's? This is the chemical group that is involved in Colony Collapse Disorder in bees and documented declines of other insects and birds. A study has been done to demonstrate that even the Bt-crop alone without chemical applications is capable of killing bees. Considering the essential contribution bees make to our food availability, why are you condoning their destruction via the support you give to GMO production?

The neonics are almost certainly the cause of the huge coastal decline in all amphibian species in at least the region I operate from - if not everywhere in Australia where neonics are used by both agriculture and households. Prior to the introduction of the neonics in 1996, there were no noticeable health problems in amphibians other than chytrid fungus in cooler climes. Immediately after the neonics hit the market, frogs started being overrun by concurrent parasite infestations, flesh-eaters, simultaneous environmental pathogens, CANCER, and MALFORMATIONS. A strange coincidence perhaps but Lyssavirus in bats and transmissible cancer in Tassie Devils also started up about that time. While the group I volunteer for doesn't have the money for toxicology, we are extremely confident that neonics are not only involved in frog decline – they are driving it. Additionally, neonics are flowing out to the Barrier Reef (testing done by TropWater) where they are likely to be causing problems there that have not been researched (neonics are officially classified as a 'severe marine pollutant' so there is an acknowledgement that they do cause problems in marine life). **If you insist on encouraging the existence of a polluting industry which produces pesticide-ridden, nutrient-void, 'mutant food' in Australia, then it MUST be grown in closed warehouses to keep it and its supporting chemicals contained. The same applies to trials.**

ToR: 2) existing and potential mechanisms to facilitate an agile and effective Scheme, which will ensure continued protection of health and safety of people and the environment.

I would like to quote from the National Food Plan concerning the 'safety' of GMO's:

http://www.agriculture.gov.au/ag-farm-food/food/publications/national_food_plan/white-paper/4-1-an-innovative-and-adaptive-industry

Genetically modified foods

People have been manipulating the genetic make-up of plants and animals for thousands of years using traditional cross breeding methods, selecting plants and animals with the most desirable characteristics to breed the next generation.

These desirable characteristics came from naturally occurring differences in the genetic composition of individual plants or animals. Modern techniques of genetic modification speed up this process of selective breeding, providing new ways of identifying particular characteristics and transferring them between living organisms. Some examples of genetically modified (GM) foods are corn plants with a gene that makes them resistant to insect attack and soybeans with a modified fatty acid content that makes the oil better suited for frying.

In Australia, the Office of the Gene Technology Regulator oversees the development and environmental release of GM organisms while Food Standards Australia New Zealand undertakes comprehensive safety assessments on all GM food. The safety assessment is one of the most rigorous in the world. This ensures that approved GM foods have no greater risks than comparable conventional foods and that they offer the same or greater benefits. With this safety net in place, we support the use of GM foods.

Despite Australia's safety net, some people prefer not to eat GM foods. To give consumers a choice, under Australian law GM foods and ingredients must be identified on food labels. Some foods containing very low levels of GM ingredients are exempt.

In the end it is all about choice. We will not tell farmers what to grow– they have the right to choose to grow crops that are traditional or modern, that are conventionally bred or have approved GM traits. We will not tell consumers what to eat–they have the right to choose whether or not they eat GM food.

[end of excerpt]

Most of the above is pure spin to deceive the public and sounds like it was written by a lobbyist. Genetic manipulation is not an extension of selective breeding but rather a deliberate molestation of genetic content and epigenetics. As for labelling, I'd be grateful if you can provide me with a list

of products sold in Australia that actually conform to the statement about labelling GMO's because I have never seen one. Additionally, this "safety net" referred to above is a 'false positive'. Does the FSANZ actually do "comprehensive studies" on GMO's including its own long-term studies on the effects of GMO's in the human body? I suspect not.

There is a lot of interest overseas in being able to do long-term studies on GMO's but how can independent testing be done when the biotechs refuse to provide their product OR they provide it under the proviso that projects are limited to 90 days max (too short to obtain any valid results)? (multiple interviewees, GMO's Revealed doco) How can papers disputing GMO safety be published in peer reviewed journals when the authors are subsequently subjected to sacking, defamation and lawsuits (e.g., Seralini study, and others)? When governments allow biotechs (and chemical companies) to do all "safety" testing in-house, what sort of results do you seriously think you are going to get? No biotech (or chemical company) is going to spend money on R&D and then provide you a testing report which says, "we tested this product and found it to be carcinogenic/ mutagenic/ environmentally destructive". They will simply provide whatever it is that gets them through the approval process with no outside or independent analysis over the process. Both the APVMA and the Chemical Assessment branch of Environment Australia have confirmed for me that they don't do any testing of chemicals which are approved in this country – they just read the corporate info and approve it. I'm sure the FSANZ is the same which would mean that the statement from the Food Plan saying they do "comprehensive testing" is an outright lie. **Allowing companies to determine safety in-house is not a safety net for the public which means that full disclosure product labelling must be required and enforced so that the public can make an informed choice (this argument applies to additives as well).** The cigarette industry provides a parallel – for decades they insisted it was safe and we now know that it isn't. However, cigarettes can still be sold in shops. While recognised as bad for your health, they are very clearly labelled with warnings on every pack so that the public can know exactly what they are choosing.

Various states in the USA have tried to legislate the labelling of GMO's on food sold in those states (e.g., Proposition 37 in CA, Vermont, etc.) and the biotechs have spent millions of dollars on campaigns against it. In Vermont's case, they were threatened with a major lawsuit if they passed any laws requiring GMO's to be properly labelled. What have biotech's got to hide that they insist the public NOT be told when they are consuming GMO's? If GMO food was truly harmless, then there would be no reason to deliberately conceal it in the food supply.

Your policy is one sided

Under what mechanisms do you recognise, consider and respond to the negative consequences and damages caused by gene technology? Your ToR only refers to an existing acceptance and expansion of the technology without any regard to the likelihood that the technology is causing more problems than it solves. Have you noticed the correlations between escalating chronic health rates which mirror exactly the rising use of GMO's and the chemicals required to grow them? How are Australians to be made better off by gene technology when the ongoing consumption of GMO's is making them too sick to work? How is the economy affected when less people are contributing to the tax base and more people need to receive support from health and other agencies? How is one of the country's biggest industries (tourism) supposed to survive when the chemical pollution associated with intensive agriculture generally but especially with growing GMO's is destroying biodiversity and wrecking World Heritage sites like the Great Barrier Reef? Where will our food come from when GMO's have decimated our bee population (which has actually started in Australia but is not well publicised)?

GMO's are not benevolent. They are simply a means for biotechs to create more patents (and therefore controls) on the food supply, maximise their chemical sales, and create a larger demand for drugs (which many biotechs are also involved in). The justifications they come up with to say how beneficial and warranted these products will be are just a smoke-screen to hide the much greater downsides of producing and eating them. Indeed, if you looked beyond the calculated

information you receive from biotechs (who are only interested in their shareholder value), you would find plenty of studies and doctors in functional medicine who can attest to the specific damage GMO's cause. But of course, you will not be properly informed about these studies and empirical experiences if your policy remains one sided in favour of expansion only and does not incorporate a process for receiving and responding to adverse consequences.

As someone who used to eat GMO's (out of convenience), my health was wrecked to the point where I could no longer hold down a job. After my second stroke, I abandoned processed food and GMO's. Everyone said I looked better but, internally, I am still a mess. Seven years down the track, I am still trying to reverse the damage they did to my gut and my brain and the recovery process has been expensive for someone on a fixed income. At this rate, it could be another seven years before I regain full capacity – if I ever regain that at all. **GMO's are very bad news for human health and ecosystem services and your job as a government is to protect the population from them. At the very least, this technology needs to be banned from all Barrier Reef catchments, properly contained where it is allowed, and fully disclosed on all food labels to stop the deliberate deceit of the Australian people.**

Thank you for reading my comments.

Sincerely,

Deborah Pergolotti
winner: Centenary Medal, Cassowary award
FNQ