

Submission Cover Sheet

# Review of the Moratorium on GM Canola

**Submission Number:** 13

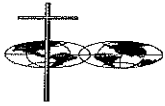
**Name of Individual/Organisation:** Columban Justice, Peace and Integrity of  
Creation Australia

**Date Received:** 6 August 2007

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**Attachments Submitted with this Submission:**

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06 AUG 2007

Department of  
Primary Industries

**COLUMBAN JUSTICE, PEACE and  
INTEGRITY of CREATION AUSTRALIA (JPICoZ)**

Submission 13

25 July 2007

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Dear Chair

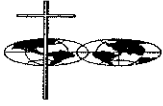
This letter is in response to the invitation for comment on to the review of canola in the light of the Victorian Government's Control of GM Crops Act 2004. I write as the Coordinator of Columban Justice Peace and Integrity of Creation (JPICoZ) in Australia which is part of the Catholic Missionary Society of St Columban. Our Society's negative overseas experience of the operations of biotech companies is the main source of evidence for this letter. The World Council of Churches documents similar experiences ('Transforming Life' 2006 <http://wcc-coe.org/>). In summary, I ask that the Regulations on the growing of GM crops due to expire 29 February 2008 be extended without amendment so that the moratorium continues.

First, I submit that conditions prevailing before the 2004 Act still exist, namely, that GM crops pose a threat to the industry's economics, so the moratorium should be extended (5.1). Moreover, calculating the net benefit to the community must take into account health costs, especially the growing prevalence of childhood allergies (5.1, 2). It is up to the GM industry to show that GM is not a contributing factor to these illnesses as anecdotal evidence indicates. The moratorium has to some degree achieved its aims so the fear that other States might change their GM policies is no reason for Victoria to adopt bad policy (5.1, 9).

- 1/ Evidence of overseas market resistance to importing GM products is growing, not declining. (cf. [www.gmwatch.org.au](http://www.gmwatch.org.au)).
- 2/ Evidence grows of buyer resistance to GM products among Australian consumers. (cf consumer survey by Greenpeace [www.greenpeace.org.au](http://www.greenpeace.org.au))
- 3/ There is evidence that gene-technology companies aim to control the food chain, including farmers incomes, through a) the imposition of intellectual property laws over GM crops, and b) the contamination of conventionally grown and organic crops which are in market opposition to them.
- 4/ There is evidence that conventional breeding research done in the public arena, which benefits both farmers financially and law-makers in decision making, is being starved of funds with preference going to transgenics (cf. TRIPs Agreement of the WTO). Independent science, and therefore divergent opinion, is being undermined by biotech companies through the privatisation of research and research grants with commercial secrecy clauses attached (eg within parts of the CSIRO). This can lead to paucity of or wrong data being given to decision makers.
- 5/ The promise of greater yields, disease resistance, salt tolerance and the like from GM crops are just that, promises. There is evidence to the contrary in any longer term studies. Conventional breeding can deliver the same results and, even though it is slower, the process allows for proper monitoring over time to better assure results and safety. (cf Science in Society [www.i-sis.org.uk](http://www.i-sis.org.uk))
- 6/ I submit that the supposed co-existence of GM and non-GM crops is unrealistic but promoted on purpose by those who want to undermine both conventional and organic systems of agriculture. Managing risk to so called thresholds is like speaking about being a little bit pregnant. The cost to farmers, grain handlers and food processors of trying to implement such a pipe dream is considerable, and ultimately to no avail. Cross-contamination has already taken place with canola seed in Australia and it must be reversed, not facilitated by dropping the moratorium (cf. [www.non-gm-farmers.com](http://www.non-gm-farmers.com)).

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**COLUMBAN JUSTICE, PEACE and  
INTEGRITY of CREATION AUSTRALIA (JPICoZ)**

Secondly, I submit that even current threshold levels for the unintended presence of GM canola are too high (5.2, 2). Any level of risk (commercial, health or environmental) associated with GM crops, and there is evidence of many risks, is unacceptable. So a precautionary approach would mean only regulations which extend the ban on commercialization of GM crops would be commensurate with the risks involved.

Thirdly, I submit that global developments in biotechnology have moved to a new level of danger as Roundup Ready (gluphosate) crops become obsolete and to be superseded by Agent Orange related Dicamba Ready GM crops. However, one positive note in biotech is the wider use of gene marker technology to identify genes in a seed's genome to be cultivated by conventional breeding.

Because Ministers from each State consider wider GM questions at the Gene Technology Ministerial Council, I take this opportunity to comment on the roles of the Office of Gene Technology Regulator (OGTR) and Food Safety Australia New Zealand (FSANZ) although I realise it is outside the terms of reference for this review of Victoria's Control of GM Crops Act 2004.

I suggest that Ministers press for OGTR's broader cognisance of human health and natural environment risks posed by GM technology. They must oppose a US-style regime of patenting law which militates against this. Likewise, I suggest that FSANZ must tighten its approval process for foods by employing independent testing and demanding fuller labeling. It seems that the PR companies employed by the biotech industry are being given the high ground.

The following is but a few reasons for changes which I suggest State Ministers should demand:

- 1/ Gene Technology is inherently dangerous – Transgenic processes use viruses, anti-biotics, nuclear transfer and the like which break down natural barriers and can facilitate virus infections as well as unintended gene sequence changes.
- 2/ Human Health at risk - The long-term health effects of transgenic foods approved without public independent testing is open to abuse. This also applies to foods stuffs using GM ingredients in their production such as protein meal stock feeds and processed oil which end up on the supermarket shelves as eggs, meat, packaged foods etc.
- 3/ Slack labeling laws hide health risks and deny consumer choice - Consumers are denied choice if GM foods are not labeled and ultimately could lose all choice as biotech companies come to monopolise the food industry.
- 4/ Environment - The native parent plants of canola, wheat etc can be genetically contaminated yet they now preserve bio-diversity and act as food security insurance. Transgenic plants both contaminate their native relatives and become herbicide resistant volunteer weeds.

Dear Chair Person, thank for this opportunity to share my personal and Society concerns. I again ask that the Regulations on the growing of GM crops due to expire 29 February 2008 be extended without amendment so that the moratorium continues.

Every best wish for the integrity of your review work, yours sincerely

**Copies to:**

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