

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

7 August 2007

GM Crop Moratorium Review Secretariat  
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Dear Chairperson

This letter is in response to the invitation for comment on the review of the moratorium enabled by the NSW Victorian Government's Gene Technology Act June 2004. In summary, I ask that the Regulations on the growing of GM crops due to expire 3 March 2008 be extended without amendment so that the moratorium continues.

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/> ).

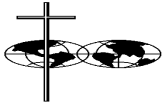
I submit that the expected negative impacts on marketing, trade and investment for NSW prevailing before the 2004 Act are still present so the moratorium should be extended as per your terms of reference (1.).

Significant reasons for extending the moratorium include:

- 1/ Evidence of overseas market resistance to importing GM products is growing, not declining. (cf. [www.gmwatch.org.au](http://www.gmwatch.org.au) ). Investment advisors predict a downturn in biotech stocks and advise against investing (cf. Science in Society [www.i-sis.org.uk](http://www.i-sis.org.uk) )
- 2/ Evidence grows of buyer resistance to GM products among Australian consumers. (cf consumer survey by Greenpeace (cf. [www.greenpeace.org.au](http://www.greenpeace.org.au) ).
- 3/ There is evidence that the livelihood of farmers and those in the food industry is in danger of being taken over by gene-technology companies. Their incomes are at risk: through
  - a) the imposition of intellectual property laws over GM crops - The cynical manipulation of law and loose GM regulations promoted by transgenic companies parallels that of the fossil fuel industry to dominate markets (cf. *Guy Pearse High and Dry Penguin* 2007), and
  - b) the contamination of conventionally grown and organic crops which are in market opposition to them - The supposed co-existence of GM and non-GM crops is unrealistic but promoted on purpose to deliberately undermine both conventional and organic systems of agriculture. 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) ).
- 4/ 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 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, long-term sustainability and safety. (cf [www.etcgroup.org.au](http://www.etcgroup.org.au) ) A precautionary approach would mean that only regulations which extend the ban on commercialization of GM crops would be commensurate with the promises and risks involved. Gene technology has only a tightly regulated place in agriculture, such as, the use of Gene Marker technology to identify genes in a seed's genome to be cultivated by conventional breeding.

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New global developments in gene technology have moved to a new level of danger. Agent Orange related Dicamba Ready GM crops are slated to supersede Roundup Ready (gluphosate) crops as they become obsolete. What marketer would want to buy such food, to say nothing of the health dangers to its producers and consumers?

I must comment on the image created by the make up of the review panel members. Ian Armstrong and Kathryn are both fellows of the Australian Institute of Company Directors, hardly a body sympathetic to small farmers or community interests. As a past Director General of CIMMYT, Tim Reeves is hardly uninfluenced by the gene-tech lobby. Its Australian partner ACIAR is active in Afghanistan where US influence on law is strong, as it was in Iraq when US patenting laws on crop seeds were imposed by Orders 39 and 81 by Administrator L. Paul Bremer. CIMMYT has also been in dispute with the ETC-Group over gene flow among Mexican maize landscapes (1995) and an article on transgenics in *Nature* 2001, not denying the facts but its style of presentation.

I must also comment on the quality of information sources offered to the government's decision makers. Research into conventional breeding done in the public arena, which benefits both farmers financially and law-makers in decision making, is being starved of funds. Preference is going to transgenic research (cf. TRIPs Agreement of the WTO) and indirectly to their PR machines. 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).

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 - Transgenic processes break down natural barriers and can facilitate unintended gene sequence changes; The long-term health effects of transgenic foods approved without public independent testing is open to abuse; Slack labeling laws hide health risks and GM ingredients in production so denying consumer choice; Native parent plants of canola, wheat etc can be genetically contaminated 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 23 March 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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