

SUBMISSION

SUPPLEMENTARY SUBMISSION TO COMMUNITY AFFAIRS COMMITTEE

Inquiry into the Food Standards Amendment (Truth in Labelling – Genetically Modified Material) Bill 2010

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Greenpeace Australia Pacific appreciates the opportunity to offer a supplementary submission on the Food Standards Amendment (Truth in Labelling- Genetic Modified Material) Bill 2010.

This submission relates to evidence by The Infant Nutrition Council regarding the use of Genetically Modified ingredients in infant formula and the failure to label these ingredients GM.

From 'accidental' to 'unavoidable' GM presence: industries policy reversal

Independent lab testing requested by Greenpeace in 2010 discovered traces of GM genes common to six different GM crops made by the multinational chemical companies, Monsanto and Dow Chemicals in infant formulas in Australia. These genes indicate contamination of the infant formulas with pesticide resistant and insect intolerant GM soy and GM corn. The formulas also contained traces of antibiotic resistant marker genes. S-26 Soy tested positive for GM DNA three times – twice with independent testing conducted by Greenpeace and once with independent testing conducted by Channel Seven.

None of the formulas which tested positive carried a GM label. This means that Australian parents are feeding GM contaminated formula to their infants without knowing it.

While the level of novel DNA detected in the infant formula was under 1%, under Australia's food labelling laws, these products should have still carried a GM label, unless the presence of GM in the product was adventitious or unintentional.

At the time, Pfizer, the makers of S-26 Soy, claimed that the presence of GM DNA in their product was 'unintentional' and that their product therefore did not need to be labelled.

Now, the Infant Nutrition Council, which includes Wyeth Nutrition, the Pfizer-owned makers of S-26 Soy, has reversed its position. In evidence to the Senate Community Affairs Committee, the industry group has acknowledged that rather than being unknown or accidental, GM is commonly present in their supply chain and that the use of some GM ingredients in their products is treated by formula makers as unavoidable.¹

Industry goes on to argue that it is because they are aware of the presence of GM in their product and because this GM presence is unavoidable, that they should not have to inform consumers of this by labelling their product as containing GM ingredients.

Open exploitation of our labelling loopholes

This case study provides a perfect example of the need to tighten ambiguities and loopholes within Australia's GM labelling laws, which are currently being openly exploited by transnational food and pharmaceutical companies.

That a company can agree that they are using GM, agree that GM presence in their product is known and unavoidable, but then claim that this is the very reason why they should not have to label their product as containing GM, makes a mockery of our labelling laws and the Australian Government's regulatory role.

Is GM in infant formula really unavoidable?

The infant formula industries claim that GM presence in formula for newborns is unavoidable is also inaccurate; it gives parents the impression that they have no choice but to feed their babies formula containing GM DNA. This is misleading.

It is inevitable that ingredients sourced from the biggest GM producing countries in the world will contain some GM DNA. Pfizer, the maker of S-26 Soy, currently admits that they source their soy and corn from North America, where over 90% of soy and 85% of corn is GM.

In Australia, both soy and corn are 100% non-GM. If industry was to source local ingredients, they would support Australian farmers and give Australian parents the right to

¹ <http://www.theaustralian.com.au/news/nation/no-guarantee-formula-gm-free/story-e6frg6nf-1226048014303>

chose whether to feed untested GM products to their newborns.

International safety and labelling standards for infant food

Industries open admission that they knowingly allow GM ingredients into their products without labelling them clearly contravenes international standards on the safety and marketing of infant formula products.

Both the UN Codex and the WHO International Code of Marketing of Breast Milk Substitutes are clear that the safety of any ingredient used in infant formula should be “scientifically demonstrated” and that all ingredients should be labelled.

The safety of GM has not been “scientifically demonstrated”. GM has never been tested on humans and there have been no long-term feeding studies on animals to determine potential chronic effects of ongoing exposure to small amounts of novel DNA in food. The animal feeding studies that have been completed show cause for concern. The CSIRO for example, found GM peas caused allergic responses in test animals.²

The Monsanto and Dow Chemicals soy and corn found in Australian infant formula have never been tested on animals in line with good laboratory practice, nor have they been tested in line with the methodology used in the CSIRO study referenced above, which detected allergic response. It is outrageous that these ingredients can be used in infant formula for vulnerable newborns, before their safety has been “scientifically demonstrated”. It is even more concerning that parents are currently unaware of this risk, because of industries continued exploitation of Australia’s labelling laws.

In response to The Infant Nutrition Council admittance that Australian infant formula contains GM ingredients, Greenpeace believes that there is an urgent need to develop and implement new policies that result in:

- **Full labeling of all foods containing any quantity of GM, or that are derived from GM**
- **A requirement that infant formula makers sourcing ingredients from high-risk, GM producing countries, tests for the presence of GM by batch and labels batches of products that contain GM.**
- **Comprehensive, independent industry monitoring and government compliance testing for genetically modified products and food derived from genetically modified crops in Australia.**

These policies on GM labelling should be supported by the creation of an intergovernmental panel to establish a best-practice safety testing system for GM crops. Safety testing parameters should require long-term animal feeding studies with *In vivo* testing for toxicological, allergological and nutritional effects with full histology.

² Prescott *et al.* Transgenic Expression of Bean -Amylase Inhibitor in Peas Results in Altered Structure and Immunogenicity. Journal of Agricultural and Food Chemistry, 53 (23), 9023 -9030, 2005.

