



Doolough Protection Group

"seeking the conservation of our environment and the future of our community"

Secretary: Anne Ruimy-Keane Ph.D., Connolly, Ennis, Co. Clare, Ireland

The EPA
P.O. Box 3000,
Johnstown Castle Estate
Co Wexford.

REF: GM Potatoes Field trial, Arodstown, Summerhill, Co. Meath.

Doolough, 8 February 2006

Dear Sir or Madam,

We are writing in reference to the proposal by BASF Plant Science GmbH to undertake a five-year "field trial" of genetically modified potatoes on a 2 ha plot at Arodstown, Summerhill, Co. Meath. The Doolough Protection Group strongly opposes such a trial in Ireland. Our concerns are based on the following considerations.

1) Health and environmental concerns

Dr. Arpad Puzstai, the Hungarian scientist who first suggested that genetically modified foods could damage health - and was systematically rubbished by Government ministers and the scientific establishment as a result - was actually working on GM potatoes. This pioneering research showed changes in the guts of rats fed with GM potatoes, which sparked worldwide fears in 1999 that eating GM foods may endanger human health. The list of scientific articles cited in the Appendix below includes a number of references to the effects of genetically modified potatoes in the diet (see References No. 4 and 9 in Appendix).

Despite the reassurances that GM foods are safe for human consumption and the environment, compelling new scientific evidence of harm from GM foods have triggered fresh demands for GM components in human food and animal feed to be banned immediately, and have also led to accusations of criminal negligence aimed at the UK Government and European Commission. Some of this evidence is presented in a review of recent research by a British NGO, see **APPENDIX** below [*"New evidence of harm from GM food trigger call immediate ban," Press Notice 25th November 2005, Source: GM Free Cymru*]. One of the most chilling piece of research to have surfaced, in our opinion, is a study involving GM soya that showed that even after one small meal transgenes could transfer out of GM food into gut bacteria at detectable levels (see below).

It is clearly only due the suppression of such research and the inappropriate pressures exerted on independent researchers that not more evidence of the negative effects of GM foods on human and animal health has surfaced so far. This however only constitutes a time bomb. Ireland will be held accountable if it does not take into account evidence that may not have been available when the first field trials were conducted elsewhere in the world. A growing body of damning evidence is now out in the open, and it is the Irish Environmental Protection Agency's duty to take the precautionary approach in this case.

The GM potato strain proposed to be tested in Ireland includes marker genes from mouse-ear cress that conveys tolerance to "Imazamox" herbicides (which contains banned Imidazolinones). If deemed "successful" by the company, the field test proposed by BASF is likely to lead to commercial and private cultivation of this GM potato strain in Ireland. This would lead to an increase in herbicide use on potatoes, a fact already demonstrated with other pesticide-resistant GM crops. This would represent an increase in human and environmental exposure to pesticides, as potatoes are a staple crop in Ireland and thus are ubiquitous throughout the country.

The Notification submitted by BASF does not appear to include environmental or health impact studies, which is unacceptable considering the nature of the risk involved, and raises questions as to the pertinence of this "field trial." What is the purpose of this trial, beyond asserting whether the GM potato developed would grow in Irish conditions ? And what is the motivation for the development of such a strain, for which no clear need has been demonstrated as potatoes are growing just fine as it is ?

2) Food security concerns

Whereas Ireland was nearly self-sufficient for its food needs only 50 years ago, food imports are becoming more prevalent in Ireland's recent globalised economic climate. Because of its position as an island on the western edge of Europe, Ireland is totally dependant on oil and on a functioning transport infrastructure for its imports of food. A disruption of global food transports due to an oil crisis for instance could cause severe food shortages in the country.

Despite its new economic prosperity and opening to the world, Ireland is still highly reliant on the potato for its food needs. The potato is Ireland's staple crop par excellence, present at every main meal in most households throughout the country, 7 days a week. Due to their bulk and ease of cultivation in Ireland's climate, potatoes consumed in Ireland are still generally produced locally, even by individual households. Potatoes thus constitute Ireland's safety net in case of a global disruption to food transports. In the scenario of a global oil shortage, one could imagine that lives could be sustained on a diet of potatoes and buttermilk, as they have been at times during Ireland's past.

Thus it is extremely important that Ireland maintains a diversity of potato crops naturally adapted to their environment. While it would appear that the strain developed by BASF could contribute to the security of the Irish potato food supply, by the introduction of genes from a wild Mexican potato variety that provides some resistance to the late potato blight fungus *Phytophthora infestans*, this is only an illusion.

Ironically, the introduction of an alien gene sequence for the purpose of increasing resistance to the potato blight, a crop disease which has caused a devastating famine in Ireland in the past, constitutes an added safety risk. Such genes introduced via highly mobile vectors (in this case two vector genes from the bacterium *Agrobacterium tumefaciens*) are known to easily migrate from host to host, and to speed up the rate of mutations in the targeted pathogens (*Phytophthora infestans* in this case). An increased pathogenicity of *Phytophthora infestans* could be a disaster in Ireland. The fact that the gene's provenance is a "wild Mexican potato variety" may make the enterprise sound harmless, but it does not constitute a reassurance at all.

The concept of diseases increasing in frequency and virulence following genetic engineering may be difficult to understand. It is however comparable to the crisis that the world is currently facing due to the widespread, and similarly needless, use of antibiotics in medicine and even household products. Scientists are recognising that bacteria exposed repeatedly to doses of antibiotics mutate into more virulent strains, a fact which has contributed to the emergence of MRSA and other deadly organisms. This is posing a worldwide threat of multi-resistant diseases not unlike that of AIDS.

Far more interesting for the point of view of the security of the Irish food supply are initiatives such as that of the Clare-based "Irish Seed Savers Association" (ISSA) which collects, grows and distributes a diversity of potato crops, adapted to various local soil and climate conditions encountered in the country, some of which are *naturally resistant* to potato blight ! Again, what is the need for this new GM strain, the development of which feeds on Irish ancestral fears of a famine - which in any case was primarily politically-induced ?

Indeed, the present proposal to introduce a GM blight-resistant potato in Ireland is comparable to other abhorrent scenarios around the world, such as the pressures applied on chronically famine-stricken Ethiopia to accept GM products under the cover of "food aid." In all these cases it is in fact economic considerations for the transnational companies which are the dominant, though hidden, motivation for the spread of GMOs which the population refuses.

3) Economic concerns

Ireland's relative "dioxin -free" and "nuclear-free" status, along with its GM-free status thus far, are one of Ireland's main asset in today's highly competitive global food economy.

While a number of toxic and domestic waste incinerators are being commissioned in Ireland, the dioxin load in the general environment and thus throughout the food chain is still limited compared to most European countries, where the older generation of less efficient incinerators have left a persistent pollution in the environment and caused health damage in the neighbouring populations.

Also thanks to successful protests, Ireland has so far remained free of nuclear power stations. This has the effect of keeping the level of radioactive material in the environment minimal and only dependent on global background levels. Other countries such as France with an 80% dependence on nuclear power for its electricity needs are grappling with the emerging realisation that local environments are contaminated at the vicinity of power plants and that neighbouring human and animal populations are being affected.

If given the go-ahead, the proposed GM field trial would be the first Irish release of GM crops since protestors ended Monsanto's GM beet trials in 1998. The proposed field trial would terminate Ireland's economically valuable GM-free status and decrease its competitiveness with emerging economic powers such as eastern European countries, as well as with the countries or regions which are making the deliberate choice to remain "GM-free."

Ireland's increasingly diverse and mature food sector is highly dependant on its "green" image. Particularly successful is the sector of the small producers and specialised products. As is the case worldwide, enterprises such as farmers markets, "slow food" fairs, health foods, organic products are growing exponentially. This is to be compared for instance with the agonising even though highly subsidised sugar beet sector. While Ireland is so far very well placed on the high value added, diverse and sustainable "micro" food sector, the proposal by BASF is threatening its emerging producers. The threats are two-fold: contamination of Ireland's "green" image as a whole, and direct contamination of potato crops, including organic crops.

4) Public perception and legal status of anti-GMO protests

Throughout the world, farmers, environmental groups and consumers have expressed their total opposition to GM crops. This is already the case with the proposed field trial in Ireland, according to an IndyMedia article [<http://www.indymedia.ie/article/73989>]. Considering Ireland's historical opposition to GM crops in the case of the Monsanto's GMO beet trials in 1998, active opposition is very likely to resurface if the current proposal was to go ahead. Elsewhere in Europe, such opposition in the form of sabotage of field trials is growing, attracting new members, who are not deterred by court actions, and are even starting to enjoy legal successes.

The movement of the French "Faucheurs volontaires" ("deliberate reapers"), which began in 1997, is particularly active on this front. The latest actions have involved 5,000 people in the South of France. These are only the most active fringe of a population which is at 75% is worried about GM field trials [*"OGM: 5000 Faucheurs volontaires", L'Ecologiste, No. 17, Jan-Feb 2006*].

Recent judgement by French courts have marked a watershed in the legal status of GM "Deliberate Reapers". On December 9th, in an unprecedented decision, the Orléans criminal court - followed by the Versailles court on January 13 for other deliberate reapers - discharged protestors for having deliberately reaped Monsanto's transgenic corn crops in 2004. The court recognized the "necessity" of their action. This necessity, according to the court, results from the "present danger of the uncontrolled spread of GMO genes, the dissemination of which had been authorized, contrary to the constitutional right to a healthy environment." [*"GMOs are unconstitutional," Le Monde, 18 January 2006*].

A statement of the Deliberate Reapers provides a philosophical basis for their actions, which are still frowned upon by a certain category of the population as being outside the law. They state : "For Gandhi, the function of non-violent action was to make the hidden violence of institutions, of the 'established disorder' visible; in the same way, we have wanted to make visible the violence done to peasants, citizens, science, democracy, and to the simple duty to govern. The French legal system has finally understood that so that we may all grasp the consequences."

The Doolough Protection Group expresses the hope that the Irish government will not expose itself to the wrath of its citizens, international disapproval, and costly legal consequences. Please reject the current BASF Plant Science GmbH Notification and keep Ireland GM-free.

Anne Ruimy-Keane Ph.D.
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APPENDIX

Press Notice 25th November 2005

Immediate Release

Source: GM Free Cymru

NEW EVIDENCE OF HARM FROM GM FOOD TRIGGERS CALL FOR IMMEDIATE BAN
UK Government and EC accused of criminal negligence and willful suppression of facts

Three new studies of the health effects of GM foods have triggered fresh demands for GM components in human food and animal feed to be banned immediately, and have also led to accusations of criminal negligence aimed at the UK Government and European Commission.

The first of the studies, conducted by Russian scientist Irina Ermakova, showed that an astounding 55% of the offspring of rats fed on GM soya died within three weeks of birth, compared with only 9% in the control group (1). The second, conducted by Manuela Malatesta and colleagues in the Universities of Pavia and Urbino in Italy, showed that mice fed on GM soya experienced a slowdown in cellular metabolism and modifications to liver and pancreas (2). And the third study, conducted by CSIRO in Australia, showed that the introduction of genes from a bean variety into a GM pea led to the creation of a novel protein which caused inflammation of the lung tissue of mice (3). So serious was the damage that the research was halted, and stocks of the GM pea have been destroyed. The developers have now made a commitment that the "rogue" variety will never be marketed.

These studies, all revealed in the scientific literature within the past few weeks, have caused widespread alarm throughout the world, since two of them suggest that GM soya (used in a large number of foods) might be very dangerous, and since they appear to confirm the findings of Dr Arpad Pusztai and Dr Stanley Ewen, whose paper on physiological changes in rats fed on GM potatoes caused a worldwide sensation in 1999 (4). The authors were given the full "shoot the messenger" treatment; they were widely vilified by the scientific community, and following an intervention from the office of Prime Minister Tony Blair Dr Pusztai was sacked, his research team was dismantled, and his funding stopped. The Ewen/Pusztai research has never been repeated, let alone extended, for fear that their results will also be replicated. And there has never been a comprehensive human feeding trial involving GM food.

There is now overwhelming evidence in the literature of deaths attributable to GM products -- among laboratory and farm animals and in the human population. Some of this evidence is presented below. And yet the GM industry, and the UK and EC regulators who are charged with the protection of the public, seem to live in a permanent state of denial reminiscent of that of the early days of the smoking/health debate. Despite opposition from European Member States, the European Commission appears to be intent upon issuing one contentious and dangerous GM authorization after another, and basing its decisions upon highly selective and biased research by the applicants themselves, while taking guidance from a despised European Food Safety Authority which has lost the confidence of NGOs and consumer groups across Europe.

Speaking for GM Free Cymru, Dr Brian John said today: "Neither the UK government nor the European Commission can pretend any longer that GM foods are harmless. They must stop singing from the hymn-sheets provided for them by the GM industry, and -- not before time -- recognize that they have a legal duty to protect residents and consumers. In our view they are already guilty of criminal negligence and the willful suppression of facts. There must be no further GM consents, and GM foodstuffs must be banned immediately -- at least until such time that independent research on animals and humans gives GM a clean bill of health (24). We already know enough to be confident that that will never happen (25)."

Professor Malcolm Hooper (20) said: "The genetic modification to food is not without danger to the consumer who may be affected by genetic changes that subsequently lead to serious chronic illnesses (cancer and chronic inflammatory disease). Further independent studies, divorced from any influence of government or corporations, are now imperative and urgent."

Prof Vyvyan Howard (21) said: "We need to change the focus of the debate away from the limited studies that have been done to date onto the size of the irreversible legacy that we are probably going to leave for future generations."

ENDS

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BRIEFING NOTE

OTHER EVIDENCE OF HARM

In spite of concerted efforts from the GM industry and from the political establishment to prevent truly independent research on the health effects of GM food, there is now a mass of information in the public domain to demonstrate that such food is potentially dangerous. We will never know how many GM varieties have been developed and then quietly abandoned before reaching the regulatory process as a result of deaths or physiological damage during animal feeding trials, since studies by Monsanto, Syngenta and the other GM corporations are conducted in-house and under conditions of great secrecy. But we do know of at least seven cases where GM varieties have been withdrawn because of direct evidence of health damage (5) (6) (7); and there are many instances of human and animal deaths arising from GM feeding trials and premature release onto the market of GM products (8-12).

In the most deadly case of all, the premature release of the GM food supplement L-tryptophan in the USA led to a large number of human deaths (estimates range from 39 to well over 100) and to the development of a new disease (referred to as eosinophilia myalgia syndrome, or EMS) which afflicted up to 10,000 people (8). When StarLink maize (intended and only approved for animal fodder) found its way into the US human food chain in 2000, there was a massive food scare when it was realized that it was potentially capable of triggering severe allergic reactions; the crop was recalled (far too late), and \$9 million had to be paid out in compensation (6). People may well have died, but the medical impact of the Starlink fiasco is a closely-guarded secret. In Hesse, Germany, 12 dairy cows died in 2001-2002 after eating GM fodder maize Bt176, which contains the Cry1Ab protein (11). When broiler chickens were fed on a diet of Chardon LL (T25) maize, the mortality rate was twice as high as that of the control group. That fodder maize variety has now been withdrawn. When the infamous Flavr-Savr GM tomato was tested, 7 out of 40 rats died within two weeks due to necrosis (5). In the case of the GM bovine growth hormone known as rBGH or BST Monsanto has persistently attempted to promote its use in spite of abundant evidence of cattle deaths and attributable problems including mastitis (10). Allergic reactions among farm workers have been preliminarily linked to Monsanto Bt maize and Bt cotton in the Philippines (2004) and India (2005), respectively (14).

In 2005 Monsanto was heavily criticised across the world for the obsessive secrecy with which it sought to keep animal feeding studies for MON863 maize out of the public domain (6). The company even insisted on a "gagging order" on Dr Arpad Pusztai, the scientist retained by the German Government to assess the scientific dossier submitted with the Monsanto authorization application to the EU. The study found "statistically significant" differences to kidney weights and certain blood parameters in the rats fed on the GM maize as compared with the control groups, and a number of scientists across Europe who saw the study (and heavily-censored summaries of it) expressed concerns about the health and safety implications if MON863 should ever enter the food chain. There was particular concern in France, where Prof Gilles-Eric Seralini of the University of Caen had been trying (without success) for almost eighteen months to obtain full disclosure of all documents relating to the MON863 study. At last, it required a resolute campaign from NGOs and a German court order to obtain the release of the study, which was then revealed to have been highly selective, and carefully designed to minimize negative health effects.

There have still been virtually no studies of the impact of GM food consumption on human health. But in one small study, referred to as the "Newcastle Feeding Study", showed in 2003 that even after one small meal containing a GM soya component, transgenes could transfer out of GM food into gut bacteria at detectable levels (15). The study was commissioned by the FSA in the UK, and that body (which has consistently promoted the merits of GM food) was so frightened by the implications of the result that it has refused absolutely to commission any repeat or follow-up studies in spite of a flood of requests from NGOs and consumer groups.

A CONSPIRACY OF FALSEHOOD

During the past decade, as the giant biotechnology corporations have extended their power base and have taken over the role as the prime funders of GM research, politicians worldwide have been happy to promote the merits of biotechnology and to believe almost everything fed to them by the spin-doctors of Monsanto, Syngenta and other companies. They have blindly promoted the interests of these corporations in spite of on-going and vociferous opposition from the public -- and from concerned NGOs and consumer groups. Public opinion polls consistently show large majorities in Europe who are opposed to the use of GMOs in food supplies. Independent scientists who have had the temerity to question the objectivity of studies submitted with applications for GM approvals, or who have themselves published "uncomfortable" research, have been victimised, marginalised and "warned off" further involvement with community groups. The conclusion is inescapable that the British Government, and the EC, subscribe to a corrupt scientific system which is based upon the following contract: "we tell you in advance what the result is, and you will be paid to get on with your work and provide us with the evidence we need".

For at least ten years the industry has consistently peddled the line that nobody has ever died or even been harmed as a result of consuming GM products. That is a lie, and it is still a lie if it is repeated a thousand times. These are typical reproductions of the lie:

Elliott Morley, Environment Minister: "In terms of existing products there has never been any indication that there is a health risk."

Dr Christopher Preston: "Many studies have been published since 2002 and all have reported no negative impact of feeding GM feed to the test species."

<http://www.agbioworld.org/biotech-info/articles/biotech-art/peer-reviewed-pubs.html>

CSIRO plant industry deputy director T. J. Higgins: "People have been eating GM food for 10 years and there isn't a single piece of evidence that it's any less safe than conventional food."

SIGNS OF PANIC

There are signs that the new studies of damage inflicted by GM foodstuffs is spreading panic in the corridors of power. That is why representatives of the President of the EC rang up Manuela Malatesta and her colleagues in Italy. That is why there is growing mistrust between the European Parliament and EFSA, which has a long reputation for "facilitating GM approvals" instead of protecting the European public. That is why EFSA has been forced to hold a stakeholders meeting (17) and to accept a barrage of criticism from NGOs and consumer groups furious with its secrecy, its complacency and its easy acceptance of all the evidence placed before it by Monsanto and other GM corporations (18). That is why the FAO organized an invitation-only workshop in its Rome HQ in October 2005 with 12 invited scientists, in order to assess the likelihood of health damage in the general population arising from the spread of GM foods. Dr Stanley Ewen, a practicing consultant histopathologist at Grampian University Hospital Trust, was invited to give the opening presentation. He subsequently said: " We laid down a definitive protocol for the testing of GM food using animals and, indeed, humans. However, Dr Harry Kuiper of the European Food Safety Authority made it quite clear that his organisation was content to accept the results of "objective studies" carried out by the GM companies. I am concerned that such objective studies are still only being developed. Additionally, that the EFSA will only commission animal experiments if there were serious molecular differences between the parent protein and the genetically modified protein. Then there would seem to be the question of who would fund such experiments and where would they be carried out? I firmly believe that there continues to be an urgent need for independent animal and human testing."

We understand from others present at that meeting that there was a consensus that there are many gaps in scientific knowledge, particularly related to GM health risks, and that new work on such risks must be commissioned at the earliest opportunity; but that Dr Kuiper, on behalf of EFSA, effectively refused to sanction such new work and refused to commit funding to it. As far as he is concerned, he is blind to any ill-effects arising from the consumption of GM foods, and he is also content to continue leading the blind European Commissioners who foolishly depend on him for guidance.

COMMENTS

Responding to the three new GM studies, and to the avalanche of new work demonstrating that GM foods are actually harmful to human beings and other animals, Dr Michael Antoniou (22) said: "If the kind of detrimental effects seen in animals fed GM food were observed in a clinical setting, the use of the product would have been

halted and further research instigated to determine the cause and find possible solutions. However, what we find repeatedly in the case of GM food is that both governments and industry plough on ahead with the development, endorsement and marketing GM foods despite the warnings of potential ill health from animal feeding studies, as if nothing has happened. This is to the point where governments and industry even seem to ignore the results of their own research! There is clearly a need more than ever before for independent research into the potential ill effects of GM food including most importantly extensive animal and human feeding trials." (24)

Speaking for GM Free Cymru, Dr Brian John said: "With news of these three studies, we have come to the inescapable conclusion that there is something seriously wrong with GM food. Any averagely intelligent person must also come to that conclusion. We think that GM soya is particularly dangerous. The GM industry, the regulatory authorities in Britain and Europe, and the politicians who are supposed to look after us, have been living in a permanent state of denial about GM ever since Arpad Pusztai and Stanley Ewen published their Lancet paper in 1999. If they persist in the pretence that all is well in the GM garden for a moment longer, they will compound their criminal negligence and their willful suppression of facts (23). They have already lost the trust of the present generation of consumers; if they continue to treat the protection of biotechnology multinationals as a greater priority than the protection of consumer health they will be guilty of a deliberate and cynical betrayal of the interests of future generations. We want nothing less than an immediate ban on all GM crops, all GM food and all GM animal feed."

NOTES AND REFERENCES

1. See Jeffrey Smith: fully referenced article in "Spilling the Beans," Oct 2005:
<http://www.seedsofdeception.com/utility/showArticle/?objectID=299>
The study was a preliminary study and has not yet been peer-reviewed and published by the author. But her results were so worrying to independent scientists that dissemination became imperative.
2. Manuela Malatesta and her colleagues have published five papers 2002-2004.
<http://www.greenplanet.net/Articolo9833.html&prev=/search?q=Manuela+Malatesta&hl=en&lr=&ie=UTF-8&sa=G>
Mangiare OGM non fa differenza? Non proprio.....
Abstracts of the papers can be found here:
<http://www.agbioworld.org/biotech-info/articles/agbio-articles/GMfeedsafetypapers.html>
3. Study conducted by the Commonwealth Scientific and Industrial Research Organisation.
<http://pubs.acs.org/cgi-bin/abstract.cgi/jafcau/2005/53/i23/abs/jf050594v.html>
New Scientist article:
<http://www.newscientist.com/article.ns?id=dn8347>
4. Ewen SWB, Pusztai A (1999) Effect of diets containing genetically modified potatoes expressing Galanthus nivalis lectin on rat small intestine. Lancet 354:1353-1354
5. The Flavr-Savr tomato was withdrawn in 1996, amid claims that it was a commercial failure. So was another variety called Endless Summer. But trials of the Flavr-Savr tomato showed there were health concerns which contributed to the "commercial" decision.
<http://www.soilassociation.org/web/sa/saweb.nsf/0/80256cad0046ee0c80256d1f005b0ce5?OpenDocument>
6. The StarLink maize fiasco occurred in 2000 and is well documented. See also:
http://www.i-sis.org.uk/biotechdebacle_updated.php
7. A new GM soya was developed, containing genes from Brazil nuts (1996). A novel protein was accidentally created which had the potential to affect people with nut allergies -- so the GM soya was withdrawn:
http://www.health24.com/dietnfood/Food_causing_disease/15-737-740,32410.asp
8. As a consequence of the L-tryptophan scandal (1989) there were c 100 deaths (Jeffrey Smith). See these:
<http://www.responsibletechnology.org/utility/showArticle/?ObjectID=283&find=L%2Dtryptophan>
www.seedsofdeception.com/Public/L-tryptophan/index.cfm
9. Fares NH, El-Sayed AK. 1998. Fine structural changes in the ileum of mice fed on delta-endotoxin-treated potatoes and transgenic potatoes. Nat Toxins. 6:219-33.

10. The rBGH bovine growth hormone (BST) has been promoted globally by Monsanto in the full knowledge of science showing damage to both cattle and those who consume the milk of cows treated with rBGH.
<http://www.responsibletechnology.org/utility/showArticle/?ObjectID=193&find=BST>
11. The deaths of cattle in Hesse, Germany, have been linked with Bt176 maize, but there appear to have been determined efforts to "lose" key scientific information and to attribute the cattle deaths to mismanagement and other factors.
<http://www.i-sis.org.uk/CAGMMAD.php>
12. Broiler chickens fed on Chardon LL -- the mortality rate was twice as high as that of the control group (NB the infamous case of Prof Alan Gray of ACRE and the failure of that Committee to examine evidence placed before it.....)
<http://www.i-sis.org.uk/appeal.php>
13. Rats fed on Chardon LL -- weight gain was much reduced
<http://www.i-sis.org.uk/appeal.php>
14. The work of the Norwegian scientist Terje Traavik and his colleagues is on-going and has still to be published. But see: "Filipino islanders blame GM crop for mystery sickness. Monsanto denies scientist's claim that maize may have caused 100 villagers to fall ill" -- John Aglionby in Kalyong, southern Philippines, The Guardian, Wednesday 3 March 3, 2004
<http://www.guardian.co.uk/gmdebate/Story/0,2763,1160789,00.html>
 Allergic reactions and cattle deaths 2005 attributable to Bt cotton In India (Madhya Pradesh):
<http://news.webindia123.com/news/showdetails.asp?id=170692&cat=Health>
15. The Newcastle feeding study (published 2003) involved a small portion of GM soya fed to just seven ileostomy patients:
<http://www.foodstandards.gov.uk/news/newsarchive/statement>
<http://www.gmwatch.org/archive2.asp?arcid=990>
 Comments by Dr Michael Antoniou
<http://www.gmwatch.org/print-archive2.asp?arcid=143>
16. Re the Monsanto rat feeding study on MON863 maize, which the company was desperate to keep out of the public domain (2004):
<http://www.seedsofdeception.com/utility/showArticle/?objectID=221>
 Genetically Modified Corn Study Reveals Health Damage and Cover-up, by Jeffrey M. Smith
http://news.independent.co.uk/world/science_technology/story.jsp?story=640430
http://www.efsa.eu.int/science/gmo/gmo_opinions/381_en.html
<http://www.gmwatch.org/archive2.asp?arcid=5270>
17. See this for the Stakeholders Meeting:
<http://www.gmwatch.org/archive2.asp?arcid=5804>
18. See, for example:
<http://eu.greenpeace.org/downloads/gmo/Bt11reportOct05.pdf>
19. Workshop on Safety of Genetically Modified Foods held at FAO Headquarters, Rome, 13 - 14 October
ftp://ftp.fao.org/es/esn/food/meetings/2005/gm_workshop_info.pdf
20. Emeritus Professor of Medicinal Chemistry,
 School of Sciences, University of Sunderland, UK
21. Professor of Bioimaging, School of Biomedical Sciences
 University of Ulster, Coleraine campus
22. Reader in Medical and Molecular Genetics, King's College London
23. The regulatory system for GM crops and foodstuffs is a disgrace, and needs to be scrapped and replaced. The GM authorizations process in both Europe and the USA is underpinned by the scientifically nonsensical

concept of "substantial equivalence", by which a cow with BSE would be considered to be "substantially equivalent" to one without. Further, the authorities depend almost exclusively upon the "science" submitted by the biotechnology corporations with their applications, which is almost always partial and selective. In other words, it is corrupt. Again, the regulatory process is designed - quite specifically - to facilitate authorizations rather than to protect the consumer. The regulatory bodies themselves are packed with placements from the GM industry -- people whose very careers depend upon a continuation of the GM enterprise. The precautionary principle, which is supposed to underpin the regulatory process, has now been effectively replaced by the "anti-precautionary principle", by which GMs are assumed to be harmless unless opponents can prove otherwise, on a variety-specific basis. But independent scientists cannot undertake effective research because the genetic constructs of new GM varieties are closely guarded secrets, and because governments will not fund their studies. And finally, in Europe at least, the Commission is more concerned about politics than science, and is determined to issue GM authorizations, come hell or high water, just to show the Americans and the WTO that there is no GM moratorium in place.

24. Letters have now gone from GM Free Cymru to the UK Food Standards Agency and to the European Food Safety Authority demanding the initiation of an urgent programme of independent research into the health effects of GM food, on the lines discussed at the recent unpublicised FOA meeting in Rome. Copies of these letters are available on request.

25. According to a letter received 24.11.05 from Arpad Pusztai, "A consistent feature of all the studies done, published or unpublished, including MON863, indicates major problems with changes in the immune status of animals fed on various GM crops/foods, the latest example of this coming from the GM pea research in Australia."