

GM Free Kerry

C/o Thomas Donovan, Tieraclea, Tarbert, Co. Kerry
gmfreekerry@yahoo.ie

Monday 20th Feb 2006

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

Dear Sir/Madam,

We, GM Free Kerry, are submitting a complaint about, and objection to the proposed planting of GM Potatoes by the German chemical / transgenic / biotechnology company BASF in county Meath. Please find attached a postal order for the complaint / objection fee of €10.

We represent a large number of concerned individuals in the county of Kerry who have all banded together in the hope of helping to save our country from the dangers of Genetically Modified live seeds.

We look forward to reading the published results of the EPA's analysis of the submissions from the public and organizations regarding this highly contentious issue.

It is our opinion that genetically modified organisms are unsafe and unstable. Due to the lack of sufficient independent testing to prove otherwise we are lodging this complaint and objection to the proposed planting.

Point 1:

The Precautionary Principle:

Below is the precautionary principle, which we are sure you are very aware of. We hope that you take it and the rest of the information below into account before you make a decision regarding the proposed planting of GM potatoes in the county of our ancient capital.

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The Precautionary Principle:

This principle advocates a cautious approach to the introduction of new technologies in cases where science does not provide a clear estimate of the magnitude of the associated risks.

The basics of the principle are:

- a) Decision makers should act to avoid and prevent harm, in advance of scientific certainty concerning risks.
- b) The burden of proof should be shifted onto the proponent of the activity, rather than left to those who are reasonably concerned about potential dangers.
- c) If the feared outcome is significantly serious then even weak evidence that risk is real maybe enough to justify action.

We feel that there are plenty of reasons to be concerned over genetically modified organisms. The potential risks from the consumption of untested food that has been mutated with gene sequences that are unstable, often forming unpredicted combinations of DNA, are substantial. This alone should be enough to prevent the planting of live GMO seeds in Irish soil.

Point 2:

We are concerned about this specific proposed GMO planting:

Quoting from January 28, 2006: Prof. Joe Cummins, Emeritus Professor of Genetics at the University of Western Ontario, Canada, in regard to the BASF proposed planting of GM potatoes in Meath.

“... the expression of the modifying genes was not studied under extreme conditions of stress such as drought, water logging, heat, cold, nitrogen excess or starvation in glass house experiments. In the past, GM crops have been tested under optimum conditions for growth prior to

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commercial or test release into real environments. Certainly, stress conditions may lead to unexpected toxicity in GM crops.

*The BASF proposal indicate that the resistance genes are not expected to exert any toxic, allergenic or harmful effects on human health arising for genetic modification. The genetic modifications are assumed to be safe because plants contain numerous NBS-LRR proteins and cultivated potatoes contain R genes from the wild species *S. demissum*.*

The assumptions of safety are specious.

It is only sensible to test glass house grown GM potatoes for not only allergenicity but for inflammation before releasing the GM potatoes to the environment.

*In the proposal the handling, release controls and disposal of *Pytophthora infestans innocula* and infected plants was alluded to but not described in detail. That should be done.*

The isolation distance 20 metres to cultivated potatoes does not seem adequate.

The premise that buffer zones will prevent cross-pollination & contamination of non-GM seeds cannot be guaranteed.

Bees can travel over 5 miles in search of pollen & will travel randomly from flower to flower.

No one can ensure that bees & other pollinating insects will not travel from GM to non-GM flowers.

No one can guarantee that wind will not blow GM pollen to non-GM crops.

The buffer zones proposed by BASF for the trial of 20m is laughable

Those opposed to the introduction of GM, even on a trial basis, believe that neither the EPA, Dept. Of Agriculture nor any other government Body can guarantee that there will not be contamination from GM to non-GM crops.

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Control of GM seeds and tuber escape from the site did not seem to be adequately described in the proposal.

Post release treatment of the test site did not seem adequately monitored nor will it achieve a clean post harvest site.

In conclusion, the considerations of human and environmental safety seem primarily based on wishful thinking not on serious efforts to gather or obtain factual information on the safety of the GM constructs.

Monitoring also seems based on wishful thinking rather than serious efforts to detect negative impacts.

The suggestion that NBS-LRR genes must be assumed safe until proven hazardous certainly appeals to greedy promoters of GM crops but does not serve the public good.

This alone should be enough to prevent the approval of this BASF proposal by the EPA. But in case it is not, there are a few other factors worth considering.

Point 3:

GM food is unsafe to eat, until it has been proved otherwise.

The technology is unsafe & consequences unknown, Unfortunately, due to the rulings of the USA's EPA and FDA, American-based biotechnology is untested for human consumption. They have declared genetically modified organisms as "significantly equivalent" to normal food, and so they fall into the "generally regarded as safe" category.

What this actually means is that the bio-companies are under no obligation to prove that their products are safe for human or animal consumption.

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Every independent consumption test done on Genetically Modified foods has raised causes for concern. Below is an excerpt from an article from www.i-sis.org.uk.

Damning evidence against the safety of GM food and feed

- ❑ Pregnant female rats fed GM Soya gave birth to severely stunted progeny and others in the litters that died within three weeks.
- ❑ GM-Soya affected cells in the pancreas, liver and testes of young mice (see main article)
- ❑ Rats fed a Monsanto GM maize developed serious kidney and blood abnormalities
- ❑ Villagers in the south of the Philippines suffered mysterious illnesses when a Monsanto GM maize hybrid came into flower; antibodies to the Bt protein in the GM maize were found in the villagers, and there have been five unexplained deaths
- ❑ A dozen cows died after eating a Syngenta GM maize and more in the herd had to be slaughtered due to mysterious illnesses
- ❑ Dr. Arpad Pusztai and colleagues found young rats fed GM potatoes damaged in every organ system including an increase in thickness of the stomach lining to twice that in controls
- ❑ Scientists in Egypt found similar effects in mice fed another GM potato
- ❑ The US Food and Drug Administration had data dating back to early 1990s showing that rats fed GM tomatoes had developed small holes in their stomach
- ❑ Chickens fed Aventis' glufosinate-tolerant GM maize were twice as likely to die compared with controls
- ❑ New research demonstrated that a harmless protein in bean when transferred to pea caused inflammation in the lungs of mice and provoked reactions to other proteins in the diet

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Commenting on some of the evidence presented here, Dr. Michael Antoniou, Reader in Medical and Molecular Genetics at King's College London, had this to say: “ ***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 [of] 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.”

A global ban on GM food and feed is long overdue. There must also be a comprehensive enquiry into the safety of GM food and feed, and into the systematic suppression and denial of the incriminating evidence.

End of Article excerpt from www.i-sis.org.uk

Ireland should not jump onto any technology bandwagon, before investing some time and money into the investigation of the issues, risks, impacts and consequences. In this case those of bringing live GMO's into the country. There are environmental, human health, agricultural and economic issues here; all of them contentious, and none of them soundly and fully investigated or debated.

The Department of Agriculture and Food, the Department of the Environment, the Department of Health and Children all need to investigate the impacts on the Irish environment and the health and

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welfare of all Irish citizens, before any decision can be made.

Point 4:

Consumers do not want to buy or eat Genetically Modified Food.

October 1998, Friends of the Earth published a NOP survey of supermarket customers and their attitudes towards GM food. The survey asked stores' customers whether they thought stores should stop selling GM food. The result: 58 per cent said YES.

The breakdown for each store was:

Marks & Spencers 65%

Somerfield 63 %

Safeway 61 %

Sainsbury's 61%

Tesco 60 %

ASDA 56%

CO-OP 56%

These are just the people who thought the supermarkets should stop selling GM foods. Not even close to the amount of people who feel that GM foods are dangerous to their health. And certainly not close to the amount of people who if choosing between conventional food and GM food, would always chose the conventional.

There is also no market for GM foods. Irish people, when they fully understand what GM foods are, will refuse to buy them, and refuse to eat them.

Every European survey conducted reveals that there is no market for GM foods in Europe. The public consumers have been shown to not trust or want to eat GM foods (surveys differ, showing 70-95% of Europeans do not want to eat GM foods).

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Even Chefs do not want to use GM food in their restaurants – a large number of prominent European chefs have opposed the introduction of GM crops, the slow food movement, top Irish chefs came out against GM foods in the Daily Irish Mail, and a substantial number of Irish restaurants have declared themselves as GMO-Free zones on the GM Free Ireland website, www.gmfreeireland.org.

Counties Clare, Monaghan and Fermanagh have declared themselves GMO free zones. There are over 1000 smaller GMO free zones declared in the country and several other counties are in the process of declaring themselves GMO free zones. (Source www.gmfreeireland.org).

GM Free Ireland represents over 32,000 farmers, consumers and organizations all opposed to the planting and consumption of GMOs. And all of whom want Ireland to be declared a GMO-Free Zone.

Point 5:

Consumer right to purchase safe, un-GM-contaminated food.

If GM live seeds are released into the country, the contamination is inevitable.

So if GM is grown here, then it will contaminate Irish food, then from where will we buy our non-GM food?

If we choose to eat non-GM conventional food, then it is our consumer right to have the choice to continue to do so.

If we choose to eat organic food, then it is our consumer right to have that choice to continue to do so.

Our right to eat non-GM conventional food and non-GM organic food must be protected also.

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Point 6:

Farmers don't want to grow it, or have it grown beside them.

The IFA, Irish Cattle & Sheep Farmers Association are amongst those opposed to release of GM seeds into Irish soils.

If the European consumers don't want to eat GM foods, where will the Irish farmers sell their GM contaminated crops?

Ireland's Organic farmers will all eventually lose their organic certification as one by one their farms become contaminated with pollen transfer from GM farms. Ireland is a very small country and the co-existence of GM & non-GM crops cannot work here. Contamination would be swift and complete.

There will be plenty of legal problems arising from GM contamination.

- Farmers will sue their neighbours for loss of earnings.
- The GM companies will sue the non-GM farmers that have GM contaminated crops for using their patented genes without a license as is happening all over the USA and Canada for the last ten years.
- The contaminated farmers could sue the government for allowing the seed into the country without adequate containment measures.
- Insurance companies are refusing to consider covering farmers for loss of earnings, crop failure, risk of being sued or any other risk that may arise from planting GM seeds on their land.

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Farmers who grow GM crops could also suffer with problems from soil erosion and reduced fertility of the land.

Point 7:

Control of all areas of the food chain will be in the hands of non-Irish multinational corporations.

Monsanto Ireland Managing Director Dr. Patrick O'Reilly told the Royal Irish Academy that it doesn't matter that GM crops would inevitably contaminate Irish farmers and put organic farmers out of business.

A telling Monsanto poster slogan: **“NO FOOD SHALL GROW THAT WE DON'T OWN”**.

Who gains from the implementation of Genetic Modification in food?
The bio-technology Companies

They make and sell the seed.

Farmers pay for the seed and the technology.

Farmers have to buy the seed every year, or pay a royalty for saved seed.

GM seeds that create infertile plants (suicide genes) are patented. (Just in case farmers save seed and don't pay...)

They make and sell the fertilizers.

Farmers have been told for years to use fertilizers.

They make and sell the pesticides and herbicides.

The new GM seeds are resistant to these so the farmers can spray the crops heavily and often.

In case farmers don't, they are developing seeds that won't even germinate unless they are sprayed.

Heavy spraying and cross-pollination of GM crops and weeds is resulting in the creation of super-weeds.

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If farmers don't buy GM seed, but their neighbours do, in a year or two the GM seed will have contaminated the non-GM farmers land. Then the bio-company who owns the patent for the seed can sue the non-GM farmer for crop sale profits and royalty for use of the patented genes, just as they have been doing all over the USA and Canada. At any stage, Monsanto, one of the largest bio-corporations is involved in suing 100 farmers for infringing on their patent rights.

GM crops only work well in intensive farm situations, so this will encourage small farmers to leave the land.

In Canada, after the introduction of GM rapeseed and soy, Monsanto is trying to introduce GM wheat. The Canadian farmers and the Canadian Farming Authorities are resisting. Monsanto has threatened to stop supporting the Canadian Universities financially, (it is a large donator to universities with bio-technology departments). Monsanto has also threatened to sue Canada for anti-commerce.

GM is a win-win scenario for bio-technology corporations and loose-loose scenario for the farmers.

Point 8:

Environmental concerns of releasing GMO's into Irish soil.

- Permanent Environmental Damage: The Dept. of Agriculture will not be able to recall the GM genes that will pass into the wild.
- Irreversible Loss of Bio diversity; instead of hundreds of varieties of each type of crop there will be one GM variety. Loss of heritage seeds and plants
- Mutations of indigenous plants
- Wild Life Threat; from cross pollination and super weeds

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- GM crops are fertilizer dependant, causing overuse of nitrates

Point 9:

Benefits of declaring the country of Ireland a GMO Free Zone.

Ireland would be in a very strong financial position if we were to become a GM free country. According to David Byrne (outgoing EU Health & Consumer Affairs) “any member state may object to the marketing on their territory of any such GM variety if they consider there is a risk for human health, the environment or agronomic reasons.”

The market sector for Organic food products is growing at over 26% a year. This makes it the fastest growing food sector.

GM is not a growing sector, it fell from 15% growth in 2001 to 11% growth in 2003, Ireland should be investing in the growing organics sector not in the failing biotechnology sector. Why is the EPA & Department of Agriculture & Food not promoting the benefits of organic farming & growing and actively encouraging farmers to go “greener”?

There will be a huge demand for GM-Free food as the rest of Europe’s farms quickly and inevitably become contaminated with pollen traveling from GM to non-GM crops.

Ireland’s external image as a “clean, green country” would be greatly enhanced by declaring ourselves a “GM Free Country”. The deliberate release of GM potatoes and / or any other GM seeds or plants into the Irish environment will devastate the image of Ireland.

This will have massive financial benefits in both the agriculture and tourism sectors. It could be just the boost needed for Irish farming.

Signed: _____

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Claire O'Connor, Secretary, GM Free Ireland