

FISH HOEK VALLEY RATEPAYERS & RESIDENTS ASSOCIATION

(Incorporating Fish Hoek, Clovelly and Sun Valley)

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SUBJECT: **OBJECTION TO APPLICATION FOR GMO DUPONT / PIONEER
HYBRID MAIZE DP-056113-g**

1. DISCUSSION

Regarding the Pioneer Hi-Bred RSA (Pty) application advertisement in the Citizen newspaper on 21 December 2018) for the field trial release of a genetically modified (GM) maize variety, DP-056113-9. We, the Fish Hoek Valley Ratepayers and Residents Association (FHVRRA), object to any monster food being advertised over the Christmas festive season. You should be ashamed for having the open for discussion period over an extended holiday thinking somehow it would limit the discussion.

This variety is part of their 'Seed Production Technology for Africa', where female hybrid parent varieties are made infertile by not producing pollen, thus eliminating the need to manually remove the tassels from female parent lines during hybrid seed production in the private seed sector. The variety includes three transgenes including one that activates the RNAi pathway. Activation of the RNAi pathway in GM crops comes with novel and additional biosafety concerns, and to date, biosafety aspects of RNAi crops are under-characterised for this controversial technology.

The Genetically Modified Organisms Act #15 of 1997 seeks to provide for measures to promote the responsible development (not always fulfilled ¹), production, use and application of genetically modified organisms; to ensure that all activities involving the use of genetically modified organisms (including importation, production, release and distribution) shall be carried out in such a way as to limit possible harmful consequences to the environment (no information on this GM); to give attention to the prevention of accidents and the effective management of waste; to establish common measures for the evaluation and reduction of the potential risks arising out of activities involving the use of genetically modified organisms; to lay down the necessary requirements and criteria for risk assessments ²; to establish a council for genetically modified organisms; to ensure that genetically modified organisms are appropriate and do not present a hazard to the environment; and to **establish appropriate procedures for the notification of specific activities** (see below) involving the use of genetically modified organisms; and to provide for matters connected therewith.³

Of concern to the FHVRRA, is that Information on this GM variety is completely lacking. It appears that this trial in South Africa may be the first time it has been released into the

¹ <https://www.dailymaverick.co.za/article/2017-12-15-food-security-planting-a-new-food-culture-of-contradictions/#.WjPfJE0UnIW>

² <https://www.amymyersmd.com/2017/08/3-reasons-to-avoid-gmos-if-you-have-an-autoimmune-disease/>

³ http://www.saflii.org/za/legis/num_act/gmoa1997286/

environment, anywhere in the world. Currently, we have no access to risk assessment data to be able to provide independent analysis of the potential biosafety risks of introducing this untested variety into the environment. This raises serious concerns to us over potential adverse effects.

Why must South Africa be the guinea pig for biohazard experimentation in unproven technology? Why is South Africa the only country in the world that allows GM varieties of its national staple food to be grown commercially?

The global population is approximately 7.6 billion and current food production is capable of feeding 14 billion people.⁴ There is no need for GMO when we currently have sufficient capacity to feed the world.

Does our environmental protection legislation need to be improved to protect us? If DuPont's executives and researchers felt so confident with this product, why not grow it in their own backyard? Producing infertile plants will require all farmers to return to DuPont Pioneer South Africa to purchase more seeds for next year's crops. This is unaffordable and unsustainable for our local, small-holder farmers. We have a serious problem with any company patenting life.

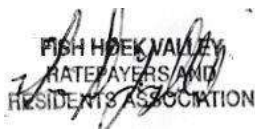
Establish Appropriate Procedures for the Notification of Specific Activities

South Africa's Department of Health (DOH) introduced labelling regulations under the Foodstuffs, Cosmetics and Disinfectants Act #54 of 1972's and associated Regulation 25 in 2004, but this has proved to be inadequate. The Department of Trade and Industry's (dti) Consumer Protection Act (CPA) #68 of 2008 and associated Regulation 293 states that ALL GM goods must be labelled, but these GM food labels are placed in the small ingredients table.⁵ We want larger labels and we want to know which pesticides have been used (active ingredients, frequency and last spray – the farmers know).

2. RECOMMENDATIONS

Therefore, it is recommended that for the reasons stated in this report, that:

Pioneer Hi-Bred RSA (Pty) Ltd's application for the field trial release of genetically modified DP-056113-9 maize, **BE DENIED**.

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DATE	24 December 2018

⁴<https://www.facebook.com/GMOFreeUSA/photos/a.468695639837571.108816.402058139834655/1944423592264761/?type=3&theater>

⁵<http://biosafety.org.za/information/know-the-basics/gmo-safety/the-labelling-of-gm-foods-in-south-africa>