

# FISH HOEK VALLEY RATEPAYERS & RESIDENTS ASSOCIATION

*(Incorporating Fish Hoek, Clovelly and Sun Valley)*

~~65B Central Circle, Fish Hoek 7975~~

Web: <https://www.fhvrta.org.za/> Facebook: [www.facebook.com/FHVRRA/](https://www.facebook.com/FHVRRA/)

Heritage Western Cape: Conservation Body

**TO:** SOUTH AFRICAN BIOSAFETY AUTHORITIES, THE EXECUTIVE COUNCIL (EC)  
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**SUBJECT: COMMENTS ON THE GMO ACT 15 OF 1997 AND 23 OF 2006 FOR  
IMPORTING HB4 GM WHEAT INTO SOUTH AFRICA AS FOOD, FEED, AND  
PROCESSING**

**DUE DATE: 15 MAY 2023**

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We, the Fish Hoek Valley Ratepayers and Residents Association (FHVRRA), feel that the Advisory Committee and Executive Council failed to adhere to the precautionary principle as contained in Genetically Modified Organisms (GMO) Act 15 of 1997 and Genetically Modified Organisms Amendment Act 23 of 2006, in that it did not adopt a risk-averse and cautious approach when it approved the entry of GM wheat, which is an important staple food in South Africa, consumed by millions of people daily.

There is no indication that the Advisory Committee or Executive Council (EC) evaluated and engaged critically with the paucity of information and food safety data, assessments and evidence, despite HB4 being grown in Argentina for the past 20 years. We find it shocking to us that EC decided that there was no need to pursue whole food and feed studies, which suggests to us that there was no rigorous scientific assessment conducted in relation to the safety and efficacy of GM wheat. Worse still, the EC failed to call for an independent risk assessment despite there being no data on the safety of the GM wheat in question, particularly since no feeding studies had been undertaken.

The research community of 1,400 scientists warned that the introduction of GM wheat would perpetuate an agribusiness model that is harmful to the environment and biodiversity while failing to solve the problems of the food system.

We are also extremely concerned about the contamination of the national wheat supply and the implications this may also have for countries to which South Africa exports wheat in the region, including Botswana, Lesotho, Zambia and Namibia. They may reject GM wheat causing our wheat price to drop drastically and shortage costs to soar.

We are concerned that this approval signifies a governance failure on the part of the EC.

We have yet to read of GM studies on herbicide tolerance and insect resistance or even drought resistant, that have proven to be efficacious,

## SUMMARY

We request that the Executive Council reviews and reassesses its decision to grant approval for the importation into South Africa of genetically modified (GM) wheat and set such approval aside.

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