

Submission to the Productivity Commission, 2016

I wish to make a public submission to the “Productivity Commission” in relation to the current “Regulation of Australian Agriculture”, 2016.

We all agree that the economy and the wellbeing of us all are of high importance. We must not for this reason alone diminish the importance of other factors such as for example the wellbeing of the environment, the basic rights of the public (end consumer) over corporate profits or the wellbeing of livestock.

While everybody will agree it is a good thing to remove *unnecessary* burdens on agriculture and other primary producers, this must not translate to a reduction of the consumer basic rights and/or uncontrolled liberties that could translate to legal conflicts or worse.

Particular points I wish to highlight:

Firstly I wish to place some emphasis on Genetically Modified (GM) crops and produce. It seems the Productivity Commission proposes to lax or remove GM regulations and/or GM moratoria (**Draft recommendation 6.1**).

Whilst the related industries affirm GM is safe and an advantage to the farmers some facts clearly tell a different story.

It is well known that non-GM crops sell at a premium due to the higher world demand and on the long run yield more than GM crops. Furthermore, as it has been seen a number of times and contrary to **Draft finding 6.1**, GM crops are impossible to contain endangering irreparably the very subsistence of non-GM and organic food (i.e. see Marsh vs. Baxter – court proceeding in WA).

GM crops and the uncontrolled use of their designer herbicides (i.e. Roundup) have created uncontrollable “superweeds” with unknown future consequences.

More independent and transparent research must be done to clear all concerns before the industry takes the road of no return. Until then the banning of GM and moratoria must stand.

And it is therefore paramount also to respect the basic rights of the public to know what they buy and eat and mandatory labeling of all genetically modified ingredients in our food chain to be clearly labeled; not to stop legislation on GM labeling laws (**Draft recommendation 9.1**).

Lets not forget the long-term safety of GM food consumption is still to be proven, and the little evidence to its safety as utilized by regulatory bodies (i.e. FSANZ and the OGTR) is taken on bona-fide from what information the concerned industry has supplied while independent studies have been grossly ignored. A large sector of the community has no confidence in FSANZ and/or the OGTR due to its traditionally clear preference to side with industry over public safety and concerns.

At best GM is controversial and there are great concerns, particularly if we compare with past experiences with “*approved*” products such as with DDT pesticides and 2,4,5,T herbicides, the tobacco or the asbestos industry and many others where industry knowingly misled and openly lied to the public and government for profit. It took many years for the truth about these products to surface and to be made public. By then irreparable harm had been done.

Allowing undesired exposure to GM produce without knowledge would amount to gross negligence and not to label GM an offensive contempt against the public basic rights.

The Commission seems to also suggest the standard for the level of gluten allowed in foods labeled, as 'gluten-free' to be reviewed (**Draft recommendation 9.2**). It seems doubtful that the commission fully understands the consequences to the health and wellbeing of some consumers, particularly when suffering of “Celiac Disease”, by ingesting the minutest amounts of gluten. To allow any level of gluten contamination on produce labeled as “Gluten Free” amounts to scandalous neglect. Gluten Free must be exactly that; “Gluten Free”.

I wish to briefly end by highlighting the public statement made by the Productivity Commission:

The Productivity Commission

The Productivity Commission is the Australian Government’s independent research and advisory body on a range of economic, social and environmental issues affecting the welfare of Australians. Its role, expressed most simply, is to help governments make better policies, in the long term interest of the Australian community.

The Commission’s independence is underpinned by an Act of Parliament. Its processes and outputs are open to public scrutiny and are driven by concern for the wellbeing of the community as a whole.

If true that the “Productivity Commission” only concern is the “... *long term interest of the Australian community*” and “... *the wellbeing of the community as a whole*”, then all the proposed recommendations should reflect precisely that. However, the Productivity Commission is failing miserably in its duties and public statement.

The basic rights of the consumer and safety of the public must be the number one priority when considering any recommendations that may be passed as law. Short of that it would be an act of Gross Negligence.

Sincerely;

Miguel Pez