

Community Alliance for Global Justice

strengthening the global food sovereignty movement

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The Registrar: Genetically Modified Organisms Act
Private Bag X973
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Email: GMOAppComments@daff.gov.za

15 April 2019

Community Alliance for Global Justice (CAGJ) submits the following comments to the South African Government Authorities on Genetically Modified Organisms:

CAGJ and our AGRA Watch campaign respectfully urge the government of South Africa to reject the applications from Dow AgroSciences' for commercial release of three maize seed varieties genetically-engineered to resist applications of the herbicide 2,4-D.

CAGJ is a non-governmental organization based in Seattle, Washington, USA. We educate and mobilize with individuals and organizations to transform unjust trade and agricultural policies and practices imposed by corporations, governments and other institutions. Our AGRA Watch campaign works with partner organizations in Africa to support communities across the continent practicing sustainable, socially responsible agriculture based on indigenous practices and agroecological farming. As a member of the US Food Sovereignty Alliance and National Family Farm Coalition, CAGJ supports farmworkers, family farmers and smallholder farmers in advocating to halt the environmental and health risks that result from chemical pesticides and herbicides such as 2,4-D and glyphosate.

We urge the South African government to not allow genetically-engineered staple crops resistant to dangerous herbicides and toxic chemicals into the fields of South African farms. Based on the experiences in the United States, we respectfully caution: 2,4-D resistant crops will increase the use of 2,4-D as well as glyphosate (both ingredients in the products designed to be used with DowAgrosciences' herbicide-resistant GMO maize); this will cause pesticide drift to other vulnerable crops (in the US, 2,4-D has been responsible for more crop damage due to herbicide drift than any other pesticide); this will lead to an increase in weeds developing resistance to 2,4-D and glyphosate (over 90 million acres of US farmland are currently infested with glyphosate-resistant weeds); and poses serious health risks to farmers and farmworkers, women, children, rural communities, and anyone consuming the harvested food or products from crops grown with these toxic chemicals.

2,4-D is a hazardous, carcinogenic herbicide that has been linked to cancer, birth defects and reproductive toxicity; and is known as one of the components of the deadly defoliant Agent Orange. Glyphosate, the main ingredient of Bayer-Monsanto's Roundup product, has led to long-term illnesses in the people who spray it and has contaminated soil and drinking water. In the US, Bayer-Monsanto has been sued in over 9,300 cases for causing terminal cancer with its Roundup glyphosate product, yet the company claims that glyphosate is safe.

The commercialization of 2,4-D and glyphosate-resistant maize in South Africa will inevitably cause increased exposure to toxic chemical pesticides and herbicides on farms and in communities. Any approval of Dow AgroSciences' applications for these three GE herbicide-resistant maize seeds will signal the government's handing over of agricultural development to the agribusiness industry – a dangerous move for the environmental sustainability, biological diversity, and health of South Africans.

We urge the South African government to instead promote farming practices that do not require the use of toxic, synthetic chemicals or herbicide-resistant GMO seeds. Agroecological approaches successfully incorporate weed management, crop rotation, and organic methods to offer ecological and climate-resilient agricultural production that increases healthy soil and crops resistant to diseases and insects. This not only enhances critical environmental biodiversity but it leads to a diversity of farming practices best-suited for the particular soil and climate of the land, which decreases dependence on chemical herbicides and the agribusiness industry, increasing the economic stability of smallholder farmers.

With concern for the South African people and the future of South Africa's agriculture, CAGJ respectfully urges the South African government to reject Dow's application to distribute any and all genetically-engineered 2,4-D and glyphosate resistant maize seed varieties.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Adler', with a long horizontal line extending to the right.

Simone Adler
Organizing Director
Community Alliance for Global Justice
Seattle, WA USA