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E mālama 'ia ana ka maui ola o kākou mai kēlā hanauna a i kēia hanauna.

Our spirit of being is nurtured from generation to generation.

Testimony in SUPPORT of HB1663, and in OPPOSITION TO HB1226

March 4, 2009

Aloha kakou elected lawmakers,

Ke Kula O Samuel Manaiakalani Kamakau is a Hawaiian immersion charter school located in Kane'ōhe Hawai'i. Our school focuses on educating our future leaders and community members with an emphasis on some key principles and Hawaiian values including: Malama 'Aina, Stewardship of the Land, Malama Kino, Health and Wellness. 'Ai Pono, Healthy Diet.

We the 'Uo Mamo, or Board of Directors comprised of representatives consisting of school faculty including school director, teachers, support staff, parents, students and community members of Ke Kula O S.M. Kamakau firmly request that you, the lawmakers elected to represent us, **support legislation imposing a ban on Genetically Modified and Genetically Engineered taro of ALL varieties of taro (colocasia esculenta) in Hawaii, and oppose any legislation preempting genetic modification at any level in Hawai'i.**

Our request is validated on several levels.

1. Genetically engineered taro has not been proven safe for our environment and cross contamination will pose unnecessary risks to our 'aina as well as to our native varieties of taro.
2. Genetically modified and engineered products have not been proven safe for human consumption and also poses a threat to the well known hypoallergenic properties of taro (see reference attached).
3. Genetic engineering of kalo or taro is disrespectful to Hawaiian values and beliefs.

As an educational organization that utilizes taro farming, preparation and consumption as key components of our curriculum, our concerns are great regarding this issue. As an educational program that has hopes to restore one of the largest know lo'i or wetland taro patches in the area of Ha'iku, our recognition as taro farmers and exponential amounts of future taro farmers are undeniable. The purity and integrity of taro is extremely valuable if not vital to the future of many of our lessons to be taught.

We SUPPORT legislation as indicated in HB1663 banning genetic modification of ALL taro varieties in Hawai'i, and OPPOSE legislation as indicated in HB1226 gmo preemption bill, for the same reasons listed above.

Mahalo Piha,
Ke Kula O Samuel Manaiakalani Kamakau
'Uo Mamo

SEE ATTACHED REFERENCE

Dona, A. and I.S. Arvanitoyannis. 2009. Health Risks of Genetically Modified Foods. Critical Reviews in Food Science and Nutrition. 49:2,164-175

Health Risks of Genetically Modified Foods
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Critical Reviews in Food Science and Nutrition.
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OVERVIEW

First, the authors challenge the concept of "substantial equivalence," which was used as a justification by the FDA to deregulate several key GM crops: "Substantial equivalence" may provide some theoretical points background in predicting toxicity, but in practice the only reliable way to evaluate the toxicity of a GM food is through toxicity tests on animals.

Furthermore, it has been argued that GM foods should be subjected to the same testing and approval procedures as medicines (i.e., clinical trials) since they must be adequate to ensure that any possibility of an adverse effect on human health from a GM food can be detected. "On the premise that GM crops are safe because no evidence exists to the contrary this article indicates that: "In the absence of adequate safety studies, the lack of evidence that GM food is unsafe cannot be interpreted as proof that it is safe."

Also: "The results of most of the rather few studies conducted with GM foods indicate that they may cause hepatic, pancreatic, renal, and reproductive effects and may alter hematological, biochemical, and immunologic parameters the significance of which remains unknown. The above results indicate that many GM food have some common toxic effects. Therefore, further studies should be conducted in order to elucidate the mechanism dominating this action."

Also: "Small amounts of ingested DNA may not be broken down under digestive processes and there is a possibility that this DNA may either enter the bloodstream or be excreted, especially in individuals with abnormal digestion as a result of chronic gastrointestinal disease or with immunodeficiency"

Need for testing

“The toxicity tests should comply with the guidelines for toxicity testing of drugs. It should be emphasized that since these GM foods are going to be consumed by every human being they should be tested even more thoroughly than drugs and more experiments are required in order to study the possible toxicity and make any conclusions.”

Also: “postmarketing surveillance should be part of the overall safety strategy for allergies, especially of high-risk groups such as infants and individuals in “atopic” families”

Effects on animal growth

Body weight might be significantly altered as it has been shown with the consumption of Mon863 corn (Seralini et al., 2007) and GM rice on rats (Li et al., 2004).

Effect on gastrointestinal tract

Stomach erosion and necrosis were reported in rats fed with flavr-savr GM tomatoes, while GM potatoes expressing *Galanthus nivalis* (GNA) lectin induced proliferative growth in their stomach which is of particular importance if one takes into consideration that glomerular stomach erosions can lead to life-threatening hemorrhage, especially in the elderly and patients on nonsteroidal anti-inflammatory agents (Pusztai et al., 2003).

Intestines may also be affected by GM food consumption as it has already been shown with GM potatoes expressing Bt toxin which caused the disruption, multinucleation, swelling, and increased degradation of ileal surface cells in rats (Fares and El-Sayed, 1998), GM potatoes expressing *gna* which induced proliferative growth in the small-large intestines (Ewen and Pusztai, 1999a) and GM soybean type Roundup Ready_R which caused moderate inflammation in the distal intestine of salmon (Bakke-McKellep et al. 2007). "Also: “Binding to surface carbohydrates of the mouse jejunum was also revealed with Cry1Ac protoxin of the Cry genes, the most common terminators applied in currently approved crops (Vazquez-Padron et al., 2000).

According to Pusztai et al. (2003) since it is the genetic manipulation process itself which led to toxicity, similar hazards might be seen in animals or humans fed genetically-manipulated soya, canola, and corn over a long period of time (i.e., years or decades). The chronic inflammation and proliferative effect that may be caused by some GM plants on the gastrointestinal tract may lead after years to cancer.

Effects on the liver

As for the effects of GM food on liver there are only a few long-term studies. It has been found that GM soya can alter the cell structure and functioning of the liver in mice reversibly (Malatesta et al., 2002; 2003; 2005) and can cause changes in histomorphology (Ostaszewska et al., 2005) and the protein profile of the liver in rainbow trout (Martin et al., 2003).

Alterations have also been observed in hepatic enzymes after consumption of raw rice expressing GNA lectin (Poulsen et al., 2007), GM Bt with vegetative insecticidal protein gene (Peng et al., 2007) and in DuPont’s subchronic feeding study in rats fed diets containing GM corn 1507 (MacKenzie et al., 2007). These alterations in hepatocyte cells and enzymes may be indicative of hepatocellular damage. Consumption of Mon863 corn in rats led to increase in triglycerides in females (Seralini et al., 2007).

Effect on pancreas

GM soybean has also an impact on pancreas, since changes occurred in pancreatic acinar cells

of mice and a high synthetic rate of zymogen granules containing low amounts of α -amylase (Malatesta et al., 2003). "Effect on kidneys" Another target organ of some GM crops is the kidney. Smaller kidneys were developed in DuPont's study in rats fed diets containing GM corn 1507 (MacKenzie et al., 2007), whereas consumption of Mon863 corn in rats led to lower urine phosphorus and sodium excretion in male rats. There were also small increases in focal inflammation and tubular degenerative changes characteristic of a classic chronic progressive nephropathy (Seralini et al., 2007). Rats fed GNA rice had elevated creatinine plasma concentration either due to some kind of renal effect or the increased water consumption in order to excrete the excess iron in the GNA rice diet (Poulsen et al., 2007).

Salmons fed GM soybean had higher head kidney lysozyme and higher acid phosphatase activities (Bakke-McKellep et al., 2007).

Effect on the blood

Response variables were observed in animals fed with GM crops. DuPont's study in rats fed diets containing GM corn 1507 showed a decrease in red blood cell count and hematocrit of females (MacKenzie et al., 2007) while GM corn Mon863 affected the development of blood with fewer immature red blood cells (reticulocytes) and changes in blood chemistry in rats (Seralini et al., 2007). Bt with VIP insecticidal protein gene caused a decrease in platelets, monocytes ratio in female rats, and an increase in the granulocytes ratio in male rats (Peng et al., 2007).

Effects on the immune system

As for the effects of GM crops on the immune system an increase in the production of Cry9C-specific IgG and IgG1 in rats and mice fed with GM heat-treated corn CBH351 was observed (Teshima et al., 2002) because the Cry gene possesses immunogenic properties as it was shown by Vazquez-Padron et al. (1999). Serum IgG mediates the inhibition of serum-facilitated allergen presentation. The presence of enhanced IgG Abs activates the IgG response (van Neerven et al., 1999) thereby indicating the occurrence of an allergic reaction having occurred, although Germolec et al. (2003) suggest that antigen specific IgG does not correlate to clinical allergy. Moreover, GM corn Mon863 caused higher white blood cell levels in male rats (Seralini et al., 2007). DuPont's sub chronic feeding study in rats fed diets containing GM corn 1507 showed that eosinophils concentration in females was decreased (MacKenzie et al., 2007).

Rats given a diet based on GNA rice showed enlargement of the lymph nodes, and decreased weight of the mesenteric and of the female adrenal lymph nodes which may be indicative of an immune toxic response (Poulsen et al., 2007).

Effect on biochemical parameters

Subchronic feeding of GNA rice in rats resulted in decrease in glucose, while cholesterol, triglyceride, and HDLD concentration were higher (Poulsen et al., 2007).

Mortality

An increased mortality was observed in rats fed with GM tomatoes since seven out of forty rats died within two weeks without any explanation (Pusztai et al., 2003).

Developmental effect on fetus, babies

Food-ingested M13 DNA fed to pregnant mice, was detected in various organs of fetuses and newborn animals, suggesting a possible transfer through the transplacental route (Doerfler and Schubert, 1998). Maternally ingested foreign DNA could be a potential mutagen for the developing fetus. Birthrates of piglets fed GM corn in Iowa country displayed an 80% fall due to high levels of Fusarium mold (Strieber, 2002), although it has been claimed that Bt corn expressing Cry proteins is

less contaminated with mycotoxins (Weil, 2005). A Russian rat study reported very high death rates in the young of rats fed GM soya (56% died) in stunted growth in the surviving progeny (Ermakova, 2005). A study of GM rice expressing Xa21 on the development of rat embryos showed that there was an increase in the body weight gain of pregnant rats, the body weight, body length, and tail length of fetal rats (Li et al., 2004) whereas GM rice expressing cowpea trypsin inhibitor caused an increase in the male rats' body length and in the female rats' red blood cell number, hemoglobin, and monocyte number (Zhuo et al., 2004)."

Pleiotropic and insertional effects (when genes influences multiple traits, thus one mutation such as from gmos can affect all traits):

“Concern has been expressed about the above potential effects which might cause the silencing of genes, changes in their level of expression or, potentially, the turning on of existing genes that were not previously being expressed (Conner and Jacobs, 1999). This interaction with the activity of the existing genes and biochemical pathways of plants, may lead to disruption of metabolism in unpredictable ways and to the development of new toxic compounds or an increase of the already existing ones as it happened with two genetically produced foods, tryptophan and g-linolenic acid (Hill et al., 1993; Sayanova et al., 1997).

Moreover, research into epigenetics has also revealed that genes account for only a part of the control of the biochemistry of organisms, and organisms have a level of control above genes that interact with genes explaining why genetic engineering is so unpredictable, with different results produced by each attempt and why the products are often unstable. The possibility that an unidentified compound may be present in the GM food makes crucial that each transgenic food as whole food and not as a single protein should be tested directly for toxicity in animals, although as Kuiper et al. (2004) state there are limitations in establishing dose-response relationships.”

Gmo growth hormone in milk, effect on host animal

The use of rbGH in dairy cattle in order to increase milk yield has caused large controversy. Problems occurring such as an increase in mastitis may pose a risk to human health since the increased antibiotic use leads to antibiotic residues in milk (Epstein, 1996). Adverse effects in cows have been observed including lameness, mastitis, subclinical ketosis, an increase in embryonic loss and abortion, a decrease in final pregnancy rates, as well as a decrease in birth rate (Dohoo et al., 2003). It should be noted that lameness has also been reported in studies with transgenic pigs genetically engineered to carry human and bovine growth hormone genes (Pursel et al., 1989).

Gmo growth hormone in milk, IGF effect on human health

The consumption of milk from cows injected rbGH leads to an increase in IGF-I in humans, since IGF-1 survives digestion (Xian et al., 1995). The oral free IGF-1 feeding studies in rats sponsored by Monsanto and Elanco looked at by the Joint Expert Committee on Food Additives (JECFA) in 1992 had ambiguous results since neither used IGF-1 associated with its binding proteins, which are resistant to acidic conditions and may enable IGF-1 to survive digestion in the stomach. Moreover, IGF-1 is protected from digestion by the major milk protein casein (Hansen et al., 1997) and the milks buffering effect (Xian et al. 1995). Moreover, Monsanto's 90-day rat study which had previously shown that rbGH “is not orally active in rats” was re-examined and it was found that rbGH elicited a primary antigenic response meaning that rbGH was absorbed intact from the gut (Eppard et al., 1997). The full significance of human exposure to rbGH and IGF-1 is unknown, particularly in the neonate, the subpopulation at greatest risk (Morris, 1999). According to Chan (1998), at least some of the absorbed IGF-I can effectively stimulate the proliferation of cancer cells. The increased levels of IGF-I in humans predict increased rates in colon, breast, and prostate cancer, since they stimulate the indolent

slowly growing tumor cells that appear in an aging individual resulting in clinical cancer necessarily old. On the other hand, FDA states that this potential does not exist since any increase of IGF-I in milk is much lower than the physiological amount produced in the organism. These concerns about the consumption of milk from cows injected rbGH may be carried also to other animals such as pigs expressing human GH, pigs injected recombinant porcine somatotropin (rpST), and GH transgenic salmon.

Pigs expressing human growth hormone

Transgenic pigs expressing human GH showed dramatic effects in growth rates, feed conversion, and body composition, but exhibited serious side effects that were attributable to the high level of GH expression (Pursel et al., 1989). Repeated injections of rpST can also produce altered lipid composition similar to that of the GH transgenic pigs (Solomon et al., 1997). Growth hormone on fish However, when the fish growth hormone (GM) gene is introduced in salmon may GH circulation may elevate by 40-fold, leading to enlarged skulls and impair feeding and respiration (Dunham and Devlin, 1999). Experiments should be conducted in animals being fed GH transgenic salmon and other fish in order to examine whether the consumption of GH transgenic fish expressing high levels of GH will increase the levels of IGFI and lead to the same health risks as rbGH milk. It should be emphasized that as in milk there is a possibility that the presence of other proteins in the fish tissue may protect IGF- 1 from digestion, which remains to be demonstrated in animal studies.

GM pigs

The experiment of Saeki et al. (2004) with pigs containing spinach desaturase gene which converts saturated fat into the unsaturated fat linoleic acid resulted in a high degree of mortality in founders and the F1 generation. Increased mortality might have been due to a random integration process where the transgene can insert in and damage any active gene locus (insertional mutagenesis) or to the significant alteration in the embryonic lipid profile caused by the transgene. The porcine embryo is unique in its high intracellular lipid content, which is associated with its sensitivity against freezing or in vitro production (Niemann and Rath, 2001). We strongly believe that the same toxicity could occur if the pregnant pigs were fed only the new source of linolenic acid obtained from transgenic canola or of any future modified crop, since it alters the percentage of 18:2n-6 in liver (Palombo et al., 2000). We should be aware that any change in the lipid profile of liver can also result in changes in metabolism with unexpected consequences.

On antinutrients

“The insertion of a new gene can sometimes lead to increase in existing levels of anti-nutrients, some of which cannot be reduced with heat treatment (Bakke-McKellep et al., 2007). One of the most widely available commercial GM products nowadays glyphosate-resistant Roundup Ready_R soybean may display an increase in anti-nutrients (Padgett et al., 1996). Heat-stable anti-nutrients such as phytoestrogens, glucinins, and phytic acid were also found to cause infertility problems in sheep and cattle (Liener, 1994), allergenic reactions and binding to phosphorus and zinc thereby making them unavailable to the animal respectively (Adams, 1995). An increase in the anti-nutrient level should not be accepted since a GM food may be consumed as raw material.”

On potential transfer to the gut

“short DNA fragments of GM plants have been detected in white blood cells and in milk of cows and in chicken and mice tissues that had been fed GM corn and soybean, respectively (Beever and Kemp, 2000; Einspainer et al., 2001; Hohlweg and Doerfler, 2001; Phipps and Beever, 2001). Furthermore, fragments of recombinant cry1Ab gene were detected in the gastrointestinal tract of

Bacillus thuringiensis (Bt)11 corn-fed pigs but not in the blood (Chowdhury et al., 2003). Therefore, it seems plausible that small amounts of ingested DNA are not broken down under physiological digestive processes. The fact that fragments of transgenic genes may not be detected in blood but can be detected in tissues of animals by PCR, underlies that they are in quite low levels in circulation and more sensitive methods of detection are needed (Puztai 2001).

Moreover, Murray and his coworkers (2007) showed that not all PCR assays can detect DNA in extractions of shortly cooked corn, making the interpretation of the results from PCR even more difficult. These limitations in the detection of GM DNA should make us reconsider the view that gene transfer cannot occur, which falls in agreement with the findings of Netherwood et al. (2004) that transgene from GM soya survived passage through the small bowel in human ileostomists. According to Flachowsky (2005) the uptake of GM DNA into cells of the gastrointestinal tract will normally have no biological consequences because the DNA will be degraded in the cell. The question is whether it can be degraded in patients with severe gastrointestinal diseases. In the unlikely event that the DNA is recombined into a host chromosome, the probability that it will exert any biological effect on that cell remains unknown.”

Allergic responses

“The introduction of novel proteins into foods such as a GM soybean variety expressing methionine from Brazil nut (Nordlee et al., 1996) and GE corn variety modified to produce a Bt endotoxin, Cry9C (Bernstein et al., 2003) may elicit potentially harmful immunological responses, including allergic hypersensitivity (Conner et al., 2003; Taylor and Hefle, 2002).

Moreover, according to Prescott et al. (2005) the introduction of a gene expressing nonallergenic protein such as GM field pea, expressing alpha-amylase inhibitor-1, may not always result in a product without allergenicity. This study underlines the need to evaluate new GM crops on a case-to-case basis and to improve the screening requirements for GM plants. Brassica juncea, another GM plant, expressing choline oxidase gene caused low IgE response in mice and a cross-reactive epitope search showed a stretch similar to Hev b 6 having some antigenic properties although according to Singh et al. (2006) it had no allergenicity. These findings should be more carefully interpreted and repeated in other animal series in order to elucidate whether IgE response may play a role in toxicity.

As for Bt expressed in many crops, farm workers exposed to

Bt pesticide may develop skin sensitization and IgG antibodies to the Bt spore extraction (Bernstein et al., 2003).”Effects on animal growthBody weight might be significantly altered as it has been shown with the consumption of Mon863 corn (Seralini et al., 2007) and GM rice on rats (Li et al., 2004).

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