AANTEKENEN

ZIENSWIJZE EN BEZWAARSCHRIFT

Ook te lezen op http://www.gentechvrij.nl/plaatjesgen/hondlang.pdf
per e-mail verzonden aan BGGO(a)rivm.nl

Lelystad, 12 oktober 2010.

De Minister van VROM

T.a.v. RIVM/SEC/Bureau GGO

Postbus 1

3720 BA Bilthoven

Geachte mevrouw,

Betreft; zienswijze, bedenkingen en bezwaar tegen:

Vergunningsaanvraag van de Universiteit Utrecht.

Op 08-02-2010 heeft het Ministerie van Volkshuisvesting, Ruimtelijke Ordening en Milieubeheer (hierna: VROM) van de Universiteit Utrecht te Utrecht een vergunningsaanvraag op grond van het Besluit genetisch gemodificeerde organismen milieubeheer (hierna: Besluit ggo) ontvangen voor introductie in het milieu van genetisch gemodificeerde organismen. De aanvraag is geregistreerd met ***het kenmerk PorM/RB IM 10-002.***

De aanvraag betreft een studie waarin plasmide DNA wordt toegediend aan ***honden met uitgezaaid en uitbehandeld melanoom (huidkanker)*** *om de klinische effectiviteit van een behandeling met het plasmide DNA te evalueren. Het plasmide DNA bevat de sequentie voor het* ***humane*** *tyrosinase eiwit. Het plasmide wordt in spierweefsel toegediend waardoor een aantal spiercellen het DNA zullen opnemen, wat zal leiden tot de productie van humaan tyrosinase in deze cellen. Hiermee wordt beoogd om de herkenning van de tumorcellen door het afweersysteem te stimuleren. De verwachting is dat het afweersysteem maligne melanoomcellen gaat herkennen en zal verwijderen. Het betreft* ***Merial's ONCEPT(TM) canine melanoma therapeutic DNA vaccine.*** *De werkzaamheden zijn voorgenomen plaats te vinden in de gemeente Utrecht.*

Op grond van het Besluit ggo dient de Minister van VROM, in overeenstemming met de Minister van Landbouw, Natuur en Voedselkwaliteit, op deze aanvraag te beslissen.

Ons commentaar (1):

Wat ons ongerust maakt is de term die telkens maar terugkomt in de risicoanalyse: " ***verwaarloosbaar klein".***

Waar blijft het advies van de COGEM?

Het valt op, dat er zo veel geheim gehouden wordt bij de risicoanalyse van Merial. Zie commentaar hierop **door Prof. Joe Cummins op blz. 5 ,6, 7 en 8. *Field-Testing a DNA Canine Melanoma Vaccine A proposal that uses "confidential business information" to conceal the most critical aspects with regard to safety while dismissing genuine safety concerns***. Dit commentaar dient u als herhaald en ingelast te beschouwen.

Ook maken wij ons zorgen over de beoogde antibiotica kanamycine en neomycine resistentie. Terughoudendheid hiermee is geboden. TBC, om maar wat te noemen, rukt op en moet ten alle tijd bestreden kunnen worden.

Zie pagina 4 van de ontwerpbeschikking.

Tevens is in het plasmide het gen gekloneerd dat codeert voor een eiwit dat zorgt voor resistentie tegen de antibiotica kanamycine en neomycine. Het betreft hier het npt-I gen dat afkomstig is uit Escherichia coli. Het gen staat in het plasmide pING/Tyrosinase onder controle van een bacteriële promoter. Hierdoor kan het product van het npt-I gen (aminoglycoside 3"-phosphotransferase) uitsluitend in bacteriën tot expressie komen.

Ons commentaar (2): Verder maken wij ons zorgen om een humaan tyrosinase eiwit dat in een zieke hond wordt gespoten, natuurlijke grenzen worden hierbij doorbroken, wat de lange termijn gevolgen zijn is onbekend.

Het plasmide wordt intramusculair toegediend met behulp van een Bioinjector. Vervolgens kunnen spiercellen het DNA opnemen. De cellen die het plasmide opgenomen hebben worden hierdoor genetisch gemodificeerd en brengen een humaan tyrosinase eiwit tot expressie.

Ons commentaar (3): Op internet is te lezen dat Merial zelf ook voorzichtig is met resultaten in de toekomst, (zie onder) verder staat in de Nederlandse risicoanalyse nergens dat het gaat om kanker in de mond onder de pootjes en aan de nagels:en dat iets minder dan 50 % van de proefdieren overlijdt.

http://www.fiercebiotech.com/press-releases/vical-announces-licensees-approval-oncept-tm-therapeutic-melanoma-vaccine-dogs-0

Vical Announces Licensee's Approval of ONCEPT(TM) Therapeutic Melanoma Vaccine for Dogs

TOOLS

- *Email*
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Posted January 13, 2010

2 Bezwaar PorM/RB IM 10-002. Miep Bos, woordvoerster van the European GMO-free Citizens, Lelystad.

Vical Announces Licensee's Approval of ONCEPT(TM) Therapeutic Melanoma Vaccine for Dogs

SAN DIEGO, Jan. 11, 2010 (GLOBE NEWSWIRE) -- Vical Incorporated (Nasdaq:VICL) today announced that the U.S. Department of Agriculture (USDA) has granted the company's licensee Merial Limited, the animal health subsidiary of sanofi-aventis, full licensure for its ONCEPT(TM) canine melanoma vaccine, a therapeutic DNA vaccine designed to aid in extending survival of dogs with ***oral melanoma.*** *Merial plans to launch the product at the North American Veterinary Conference (Orlando, January 16 - 20).*

"The approval of ONCEPT(TM) is a milestone in the cancer vaccine field and a significant advancement for our DNA delivery technology platform," said Vijay B. Samant, Vical's President and Chief Executive Officer. "Therapeutic vaccines -- the holy grail of vaccinology -- are delivered after disease onset to impede disease progress for the patient's benefit. ONCEPT(TM) is to our knowledge the only therapeutic vaccine approved, and we ***believe this achievement is a major step toward the initial approvals of therapeutic vaccines for humans.*** *We also believe that regulatory acceptance of ONCEPT(TM) bodes well for similar product candidates such as our Allovectin-7(R) DNA-based immunotherapeutic for patients with metastatic melanoma. ONCEPT(TM) uses a xenogeneic approach and Allovectin-7(R) uses an allogeneic approach, both employing the immune system's self/non-self recognition ability to drive a potent immune response against melanoma. Through our independent and partnered programs, we are advancing well toward additional approvals of DNA-based products."*

About ONCEPT(TM)

The ONCEPT(TM) canine melanoma vaccine contains a gene encoding human tyrosinase, an enzyme associated with skin pigmentation. The tyrosinase produced from the human DNA used in this vaccine is similar to canine tyrosinase and has been shown to stimulate an immune response against canine melanoma cells producing tyrosinase. The use of DNA from a noncanine species causes production of tyrosinase that is considered foreign by the canine immune system (thereby stimulating a potent immune response), yet is similar enough to canine tyrosinase that the dog's immune response will target canine melanoma cells.

ONCEPT(TM) significantly extends survival time following primary tumor removal. Dogs with stage II or III malignant melanoma typically have survival times of less than six months when treated with surgery alone. In a controlled study, dogs vaccinated with ONCEPT(TM) following surgery had significantly better survival times than unvaccinated dogs ($p<0.0001$). Median survival time could not be determined for vaccinated dogs, ***since more than 50% of the treated dogs were still surviving at the time of publication of the study.***

About Canine Melanoma

Melanoma is a common type of cancer in dogs and is the most common malignant tumor of the dog's mouth and can also occur in the nail and footpad. Canine oral melanoma may affect any breed and is a highly aggressive cancer. Normal treatment for canine oral melanoma includes

surgery and/or radiation, but even after successful local treatment, the melanoma frequently spreads throughout the body, including the lymph nodes, liver, lungs and kidneys, and is often resistant to chemotherapy.

About Vical

Vical researches and develops biopharmaceutical products based on its patented DNA delivery technologies for the prevention and treatment of serious or life-threatening diseases. Potential applications of the company's DNA delivery technology include DNA vaccines for infectious diseases or cancer, in which the expressed protein is an immunogen; cancer immunotherapeutics, in which the expressed protein is an immune system stimulant; and cardiovascular therapies, in which the expressed protein is an angiogenic growth factor. The company is developing certain infectious disease vaccines and cancer therapeutics internally. In addition, the company collaborates with major pharmaceutical companies and biotechnology companies that give it access to complementary technologies or greater resources. These strategic partnerships provide the company with mutually beneficial opportunities to expand its product pipeline and address significant unmet medical needs. Additional information on Vical is available at www.vical.com.

The Vical Incorporated logo is available at http://www.globenewswire.com/newsroom/prs/?pkgid=5768

This press release contains forward-looking statements subject to risks and uncertainties that could cause actual results to differ materially from those projected. Forward-looking statements include statements about Merial's ONCEPT(TM) canine melanoma therapeutic DNA vaccine, Vical's Allovectin-7(R) DNA-based human immunotherapeutic for metastatic melanoma, Vical's DNA delivery platform technology and its current and potential applications, as well as the company's focus, collaborative partners, and product candidates. Risks and uncertainties include whether Merial will successfully market ONCEPT(TM), and if so, to what extent; whether market success for ONCEPT(TM) will encourage development of other cancer vaccines and similar products; whether Vical's Allovectin-7(R) or any other product candidates under development by Vical or its collaborative partners, will be shown to be safe and effective in clinical trials or receive any regulatory approvals; the timing, nature and cost of clinical trials; whether Vical or its collaborative partners will seek or gain approval to market any product candidates; whether Vical or its collaborative partners will succeed in marketing any product candidates; and additional risks set forth in the company's filings with the Securities and Exchange Commission. These forward-looking statements represent the company's judgment as of the date of this release. The company disclaims, however, any intent or obligation to update these forward-looking statements.

Read more: Vical Announces Licensee's Approval of ONCEPT(TM) Therapeutic Melanoma Vaccine for Dogs - FierceBiotech http://www.fiercebiotech.com/press-releases/vical-announces-licensees-approval-oncept-tm-therapeutic-melanoma-vaccine-dogs-0#ixzz123mC9INC

Ons commentaar (4): Volgens dr. P.T. Odinot wordt gebruik gemaakt van vaccinatie met naakt nucleïnezuur, zie zijn brief van 4 februari 2010. Daar zijn echter ernstige gevaren aan verbonden:

Unregulated Hazards 'Naked' and 'Free' Nucleic Acids

ISIS Report -Produced for the Third World Network

Mae-Wan Ho, Angela Ryan Biology Department, Open University, Walton Hall, Milton Keynes MK7 6AA, UK
J.Cummins Department of Plant Sciences, University of Western Ontario Ontario, Canada
T. Traavik Dept. of Virology, Institute of Medical Biology,MH-Breivika And Norwegian Institute of Gene Ecology, N-9037 Tromso, Norway

Executive Summary

A huge variety of naked/free nucleic acids are being produced in the laboratory and released unregulated into the environment. They are used as research tools, in industrial productions and in medical applications such as gene therapy and vaccines. These nucleic acids range from oligonucleotides consisting of less than 20 nucleotides to artificial constructs thousands or millions of basepairs in length, typically containing a heterogeneous collection of genes from pathogenic bacteria, viruses and other genetic parasites belonging to practically every kingdom of living organisms. Most of the nucleic acids and constructs have either never existed in nature, or if they have, not in such large amounts. They are, by definition, xenobiotics – substances foreign to nature - with the potential to cause harm. Some, such as gene therapy vectors and vaccines, have already been shown to elicit toxic and other harmful reactions in preclinical trials. KNIP

Conclusion

The naked/free nucleic acids created by genetic engineering biotechnology are potentially the most dangerous xenobiotics to pollute our environment. Unlike chemical pollutants which dilute out and degrade over time, nucleic acids can be taken up by all cell to multiply, mutate and recombine indefinitely. The need for regulatory oversight at both national and international levels is long overdue. It is irresponsible to continue to exclude naked/free nucleic acids from the scope of the Biosafety Protocol. KNIP

***http://www.i-sis.org.uk/naked.php* Zie ook bijlage 2.**

Ons commentaar (5): Met toestemming overgenomen. Dit is een rapport met 72 verwijzingen naar onderzoeken en uitgegeven boeken van gerespecteerde onderzoekers. U gelieve deze website als herhaald en ingelast te beschouwen.

Independent Science Panel (ISP) is a panel of scientists from many disciplines, committed to the **Promotion of Science for the Public Good.** Read our statement here

The Independent Science Panel

Field-Testing a DNA Canine Melanoma Vaccine

A proposal that uses "confidential business information" to conceal the most critical aspects with regard to safety while dismissing genuine safety concerns

Prof. Joe Cummins

This report has been submitted to US Department of Agriculture-Animal and Plant Inspection Service on behalf of the Independent Science Panel

The United States Department of Agriculture-Animal and Plant Health Inspection Service (APHIS) is considering granting authorization to ship an unlicensed DNA canine melanoma vaccine for field-testing, as requested by Merial, Inc., Athens, Georgia.

The company wants to conduct clinical studies that will provide efficacy and safety data in dogs administered this vaccine. Efficacy will be measured by the sparing effect of the vaccine in dogs diagnosed with melanoma; and the safety of the vaccine will be evaluated in all animals participating in the studies. The Assessment for Field Testing Canine Melanoma Vaccine, DNA 11/15/2005 is open for public comment before 15 December 2005 at: http://www.regulations.gov/fdmspublic-bld61/component/main

The environmental assessment dealt with the novel features of DNA vaccines. But with large sections of the assessment blacked out as "confidential business information" (CBI), full evaluation of the assessment is impossible; and this is not in the public interest. Nevertheless, the use of DNA vaccines to treat canine melanoma has been discussed in the scientific literature.

DNA vaccines are normally delivered by intramuscular injection or a biolistic device, or orally administered. The vaccines are normally bacterial plasmids into which are spliced a promoter active in mammals, such as the cytomegalovirus promoter, driving the coding sequence for an antigen. The plasmid is taken up by the mammalian cells and reaches the nucleus of some of those cells. There it is transcribed into RNA, which is translocated to the cytoplasm and translated into antigen protein. The bacterial plasmid sequences are rich in CpG sequences which act as adjuvant to enhance the immune response. The DNA vaccines induce the full spectrum of immune responses including antibodies, T helper cells and cytotoxic T lymphocytes [1]; but concerns have been expressed over the induction of autoimmunity and anti-DNA antibodies, which were observed in rabbits immunized with plasmids bearing a HIV reverse transcriptase gene [2].

A phase one clinical trial of a DNA vaccine using a plasmid modified with two peptides from human tyrosinase - an enzyme on the path to melanin formation that is greatly elevated in melanoma cancer cells - was undertaken on human subjects with stage IV melanoma, in which the melanoma has spread from its site of origin. Plasmid DNA was injected into the groin lymph nodes; and 16 of 24 patients survived for 12 months [3].

Metastatic (spreading) canine malignant melanoma is common and resistant to chemotherapy. A clinical study of dogs with malignant melanoma involved treatment with plasmids containing peptides from human or mouse tyrosinase. The study showed that the inoculations were safe and resulted in anti-tyrosinase antibodies [4]. Dogs with advanced malignant melanoma survived for more than a year when inoculated with a plasmid containing a gene for a peptide from human tyrosinase. The trial supported the use of the vaccine in both

dogs and humans with advanced melanoma [5].

The report "Nucleic Acid-Mediated (Genetic) Vaccines Risk Analysis for Melanoma DNA Vaccine (Product Code 9240.D0, Unlicensed)" [6] indicated that the DNA vaccine was derived from a bacterial plasmid, but all of the pertinent information about the antigen sequence and antibiotic selection markers was blacked out presumably deemed confidential business information (CBI). The only information on the plasmid not blacked out was that it was an E coli plasmid.

Among the issues considered in the review was the chance that the vaccine antigen would recombine with genes in the dog chromosomes causing mutations. No effort was made to measure integration of the vaccine DNA, the proponents and APHIS argued that the chance of integration was low based on studies of antigen integration from the malaria parasite [7] or influenza virus or HIV virus [8]. But the dog melanoma vaccines have all been based on genes present in the mammalian genomes with high levels of DNA homology, allowing legitimate recombination at a much higher frequency than the antigen genes from parasites or viruses that have little or no homology with the mammalian genome, and must depend on illegitimate recombination. It is surprising that APHIS and the proponent failed to mention this important point.

The proponent and APHIS argue that immuno-modulator sequences such as the CpG motif are not known to be present in something blacked out related to the plasmid vaccine DNA. This point is clearly in error, for the CpG motif is present in E. coli plasmids, and is certainly active in dogs and cats [9].

The problem of auto-immunity and anti-DNA antibodies was dealt with in a cursory manner; and so was the handling and escape of plasmid bearing bacteria, with no data provided to support conclusions. The dissemination of the vaccine plasmid in the environment was also considered in the absence of experimental data. The conclusion that the plasmid ingested by animals would be of no consequence was similarly based on no experimental data, as was the dismissal of horizontal gene transfer.

The report claims that there is little or no chance of problems arising from accidental spills of solutions containing the plasmid, because the plasmid is not infectious and is unstable in the environment. Again, no data were supplied to support that conclusion, which would appear at odds with what we now know about the stability of DNA in all environment. The report maintains that plasmid shed or released from test animals posed no concern because the levels of plasmid released by those animals would be low. But no data were provided to support that conclusion; and there was no indication that feces, urine or vomited materials would be handled in any special way to prevent dispersal of the plasmid in the environment. The antibiotic resistance markers associated with the plasmid were designated CBI, and hence unavailable to any member of the public exposed to the plasmid from surface or groundwater, in air associated with dust particles or in bacteria. Many bacteria are capable of taking up DNA molecules and integrating them into the bacterial chromosome; there are at least 87 species of naturally transformable bacteria in the soil alone [10] .

In conclusion, the proposal for a field trial of a DNA vaccine to treat canine melanoma suffers from serious defects, chief among which, using CBI to conceal the most critical aspects of the proposal with regard to safety while dismissing genuine safety concerns with no empirical evidence. This proposal must be rejected and given no further consideration unless and until those defects are made good.

References

1. *Kowalczyk D and Ertl H. Immune response to DNA vaccines. CMLS Cell. Mol. Life Sci. 1999, 55, 751-70.*
2. *Isaguliants MG, Iakimtchouk K, Petrakova NV, Yermalovich MA, Zuber AK, Kashuba VI, Belikov SV, Andersson S, Kochetkov SN, Klinman DM and Wahren B. Gene immunization may induce secondary antibodies reacting with DNA. Vaccine 2004, 22(11-12),1576-85.*
3. *Tagawa ST, Lee P, Snively J, Boswell W, Ounpraseuth S, Lee S, Hickingbottom B, Smith J, Johnson D and Weber JS. Phase I study of intranodal delivery of a plasmid DNA vaccine for patients with Stage IV melanoma. Cancer 2003, 98,144-54.*
4. *Bergman PJ, Camps-Palau MA, McKnight JA, Leibman NF, Craft DM, Leung C, Liao J, Riviere I, Sadelain M, Hohenhaus AE, Gregor P, Houghton AN, Perales MA and Wolchok JD. Development of a xenogeneic DNA vaccine program for canine malignant melanoma at the Animal Medical Center. Vaccine 2005 Sep 23; [Epub ahead of print]*
5. *Bergman PJ, McKnight J, Novosad A, Charney S, Farrelly J, Craft D, Wulderk M, Jeffers Y, Sadelain M, Hohenhaus AE, Segal N, Gregor P, Engelhorn M, Riviere I, Houghton AN and Wolchok JD. Long-term survival of dogs with advanced malignant melanoma after DNA vaccination with xenogeneic human tyrosinase: a phase I trial. Clin Cancer Res. 2003, 9(4), 1284-90.*
6. *Merial, Inc. Environmental Assessment for Field Testing Canine Melanoma Vaccine, DNA 2005 Nucleic Acid-Mediated (Genetic) Vaccines Risk Analysis for Melanoma DNA Vaccine (Product Code 9240.D0, Unlicensed)" http://www.regulations.gov/fdmspublic-bld61/component/main*
7. *Martin T, Parker SE, Hedstrom R, Le T, Hoffman SL, Norman J, Hobart P and Lew D. Plasmid DNA malaria vaccine: the potential for genomic integration after intramuscular injection. Hum Gene Ther. 1999, 10(5), 759-68.*
8. *Ledwith BJ, Manam S, Troilo PJ, Barnum AB, Pauley CJ, Griffiths TG 2nd, Harper LB, Beare CM, Bagdon WJ and Nichols WW. Plasmid DNA vaccines: Investigation of integration into host cellular DNA following intramuscular Injection in mice. Intervirology 2000, 43(4-6), 258-72.*
9. *Krieg A. CpG Motifs in bacterial DNA and their immune effect. Ann Rev. Immunol. 2002, 20, 709-60.*
10. *de Vries J, Meier P and Wackernagel W. Microbial horizontal gene transfer and the DNA release from transgenic crop plants. Plant and Soil 2004, 266, 91-104.*

http://www.i-sis.org.uk/isp/FTDCMV.php

Ons commentaar (6): Nog steeds zijn de meeste data van de risicoanalyse niet bekend, maar zwart gemaakt. Over zo'n gebrekkige en incomplete onderbouwing kan en mag men geen oordeel vellen en zeker geen goedkeuring geven aan deze proeven!!

Risicoanalyse van de USDA:

http://www.regulations.gov/search/Regs/home.html#documentDetail?R=09000064800a018d

Zie ook **Gentherapie maakt slachtoffers**
http://www.volkskrant.nl/archief_gratis/article823380.ece/Gentherapie_maakt_slachtoffers
Fragment: De geneticus Inder Verma van het Salk Instituut in La Jolla (Californië) noemt in een reactie op Gelsingers dood vectoren de 'achilleshiel van de gentherapie' en pleit voor een

herbezinning op het gebruik van adenovirussen als voertuig voor het inbrengen van nieuwe genen in het menselijk lichaam.

Experimenten met genen gestopt na dood proefpersoon

Van onze wetenschapsredactie

Gepubliceerd op 25 januari 2000 00:00, bijgewerkt op 20 januari 2009 11:12 Fragment:
Vorig jaar september stierf Jesse Gelsinger (18), die deelnam aan een experiment met gentherapie voor de zeldzame ziekte OTC, een erfelijke leverfunctiestoornis. Als laatste van de achttien proefpersonen in het experiment ontving hij de hoogste dosis genetisch gemanipuleerd adenovirus waarmee het genetische defect zou moeten worden gecorrigeerd.
http://www.volkskrant.nl/archief_gratis/article831855.ece/Experimenten_met_genen_gestopt_na_dood_proefpersoon

Meeste afweerreakties op gentherapie worden niet gemeld

NRC, januari 2000: Fatale haast

Bij een gentherapie-experiment in de VS viel in september een dode.

http://www.nrc.nl/W2/Lab/GM/290100.html

Ons commentaar (7): Er zou veel meer preventief te werk moeten worden gegaan: zoals het waarschuwen van mensen en dieren tegen gewolmaniseerd hout, dat nog steeds slachtoffers maakt. Bij gewolmaniseerd hout loogt het kankerverwekkende arseen en chroom VI nog na jaren uit, vooral bij regen. Dit is bewezen door een rapport van TNO, gemaakt vanwege het gewolmaniseerd gevelhout, buiten op onze huizen. **Hondenhokken kunnen hier ook van gemaakt zijn**. Ook uit gewolmaniseerde speeltoestellen sijpelt het giftig arseen en Chroom VI naar buiten! En denk eens aan al die schuttingen die van gewolmaniseerd hout zijn gemaakt!Zie ook www.wolmanzouten.nl

Wat zijn wolmanzouten:

Wolmanzouten (CCA-zouten) bevatten:

- **374 g/l arseenzuur.**
- **532 g/l chroomtrioxide (chroom VI zuur).**
- **188 g/l koper II oxide.**

Wat zijn de kenmerken van arseenzuur en chroomtrioxide:

- arseenzuur (arseen) is een zwarte lijststof voor water, bodem en lucht
- chroomtrioxide (chroom VI) is een zwarte lijststof voor lucht

Deze zwartelijststoffen zijn zo gevaarlijk dat in internationaal verband is besloten dat in het milieu brengen ervan gezien van stofeigenschappen, zoals giftigheid. waaronder carcinogeniteit, mutageniteit en teratogeniteit . afbreekbaarheid en (bio)accumulatie, die een ernstig risico inhouden, via een maximaal brongerichte aanpak met de best bestaande techniek moet worden voorkomen. **Arseenzuur en chroomtrioxide (en hun zouten daarvan) zijn de meest kwalijke kankerverwekkende verbindingen die wij kennen. Er zijn 4- klassen aan kankerverwekkende stoffen. Arseenzuur en chroomtrioxide vallen in de zwaarste klasse, de klasse 1 van kankerverwekkende stoffen.**
Chroomtrioxide is ook nog genotoxisch hetgeen inhoudt dat deze stof geen veilige drempel kent. Het

eenmaal in je leven binnenkrijgen van één molecuul chroomtrioxide kan op termijn al kanker veroorzaken. Arseenzuur en chroomtrioxide zijn ook nog verdacht reprotoxisch, hetgeen inhoudt dat het toxische effecten (o.a. impotentie, fertiliteitsproblemen, menstruatiestoornissen, testiskanker) en/of toxische effecten op het geslacht via vrouwen en/of mannen (o.a. miskramen, ontwikkelingsstoornissen, doodgeboorte) en afwijkingen op het nageslacht als gevolg kunnen hebben. Arseenzuur en chroomtrioxide lossen goed op in water en kunnen ons lichaam via een drietal routes binnendringen.

- via de lucht (ademhaling)
- via de huid (aanraking)
- via het maagdarmkanaal (besmette voeding)

en zijn daarom levensgevaarlijk. Asbest is een bagatel vergeleken met deze stoffen. Enkel en alleen in Nederland al wordt jaarlijks via het gebrekkige product: geïmpregneerd hout. zo. n 300.000 kg. arseenzuur en zo. n 600.000 kg. chroomtrioxide op een ongecontroleerde manier diffuus in de compartimenten water, bodem en lucht gebracht.

Ook o.a. allerlei chemische middelen en straling zijn zeer kankerverwekkend:

Zie: OP-ED COLUMNIST

New Alarm Bells About Chemicals and Cancer

By NICHOLAS D. KRISTOF

Published: May 5, 2010 ***The President's Cancer Panel is the Mount Everest of the medical mainstream, so it is astonishing to learn that it is poised to join ranks with the organic food movement and declare: chemicals threaten our bodies. The cancer panel is releasing a landmark 200-page report on Thursday, warning that our lackadaisical approach to regulation may have far-reaching consequences for our health.***

I've read an advance copy of the report, and it's an extraordinary document. It calls on America to rethink the way we confront cancer, including much more rigorous regulation of chemicals.

http://www.nytimes.com/2010/05/06/opinion/06kristof.html?src=me&ref=general

Het rapport zelf:

http://deainfo.nci.nih.gov/advisory/pcp/pcp08-09rpt/PCP_Report_08-09_508.pdf

Ons commentaar (8): De onderzoekers zijn niet geheel onafhankelijk:

Long-Term Survival of Dogs with Advanced Malignant Melanoma after DNA Vaccination with Xenogeneic Human Tyrosinase

A Phase I Trial1

1. **Philip J. Bergman2, et all**

1 Supported, in part, by NIH Grants PO1 CA33049, P01 CA59350, and R01 CA56821 and by Swim across America, Mr. and Mrs. Quentin J. Kennedy Fund, Bioject, Inc., **and Merial, Ltd.**

http://clincancerres.aacrjournals.org/content/9/4/1284.full

Vaccination with human tyrosinase DNA induces antibody responses in dogs with advanced melanoma

Jack C. F. Liao1, **Polly Gregor**2,3, **Jedd D. Wolchok**2, **Francesca Orlandi**2, **Diane Craft**1, **Carrie Leung**1, **Alan N. Houghton**2, and **Philip J. Bergman**1
1 *Flaherty Comparative Oncology Laboratory, Donaldson-Atwood*

Potential conflicts of interest: ANH, JDW, and PJB have submitted a patent application related to this work, and PJB has received speaker's fees from Merial, Inc.

http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1976276/pdf/nihms26749.pdf

Ons commentaar (9): Er is te weinig (onafhankelijk) onderzoek gedaan naar de eventuele negatieve gevolgen op lange termijn. Wat die zijn, kunnen u en ik niet voorspellen. Men kijkt naar alle punten apart en slechts naar de effecten op korte termijn. De risico's op de lange termijn zijn een heikel punt. De echte calamiteiten ontstaan altijd door combinaties van oorzaken. Nog steeds zijn de meeste data van de risicoanalyse niet bekend, maar zwart gemaakt. Over zo'n gebrekkige en incomplete onderbouwing kan en mag men geen oordeel vellen en zeker geen goedkeuring geven aan deze proeven!!

Wij waarschuwen krachtig tegen deze proeven op honden.

Dit bezwaarschrift is ook hier te lezen: http://www.gentechvrij.nl/plaatjesgen/hondlang.pdf

Hoogachtend,

Miep Bos, ook namens Wieteke van Dort, Stichting VoMiGEN, en De Gentechvrije Burgers, Europees Consumentenplatform (= the European GMO-free Citizens, waarvan ik woordvoerster ben).

Lelystad

miep(a)gentechvrij.nl

www.gentechvrij.nl

CC

per e-mail cie. Vrom(a)tweedekamer.nl Leden en plaatsvervangende leden van de Vaste Kamer Commissie VROM, te Den Haag. LNV

Leden en plaatsvervangende leden van de Vaste Kamer Commissie VWS, Den Haag
cie.vws(a)tweedekamer.nl

per e-mail cie.lnv(a)tweedekamer.nl Leden en plaatsvervangende leden van de Vaste Kamer Commissie LNV, te Den Haag.

Wetenschappelijk instituut PvdD ,SP, VVD, SGP, D 66. Groenlinks, PvdA, CU.

info(a)greenpeace.nl ;

Diverse media

Bijlage 1. Machtiging Stichting VoMiGEN.

Bijlage 2. Handtekeningenlijsten, A,B,C.

Bijlage 3. *Scientists suggest that cancer is purely man-made.*

http://www.physorg.com/print206257700.html