

# Oilseed rape GT73

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**Organisation: The European GMO-free Citizens (De Gentechvrije Burgers)**  
**Country: The Netherlands**  
**Type: Others...**

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**a. Assessment:**

**3. Environmental risk assessment**

On 13 April 2007, Miep Bos/The European GMO-free Citizens/Groep Bos ('Bos Group') and organic farmers, Stichting VoMiGEN, Rotterdam, Stichting Ekopark, Lelystad, and Platform Voor Belangen van de Consument (Consumer Interests Platform/Platform BevaCo, Rotterdam) wrote as follows:

Letter to the Standing Lower House Committees on Agriculture, Nature and Food Quality (LNV) and Housing, Spatial Planning and the Environment (VROM) concerning genetically modified oilseed rape (*Brassica napus*) GT 73. We sent a letter to the members of the Standing Lower House Committees for LNV and VROM in connection with our complaint concerning the introduction into the environment (market authorisation) of GM oilseed rape GT 73 (intended for cattle feed).

Lelystad, 13 April 2007

Also sent via e-mail.

To: The members and alternate members of the Standing Lower House Committees on LNV and VROM, Attn. Mr G. van Leiden, Registrar of the Lower House of the States General

Postbus 20018  
2500 EA The Hague

Honourable members and alternate members of the Standing Lower House Committees on LNV and VROM,

We enclose a copy of our petition/complaint concerning the introduction into the environment by means of market authorisation of Monsanto's GT 73 oilseed rape and our desire for the Netherlands to remain GM free. (See <https://www.gentechvrij.nl/wp-content/uploads/2017/07/koolzaad-73-bezwaren.pdf>)

565 worried citizens, the artist Wieteke van Dort, (organic) farmers, Stichting VoMiGEN, Rotterdam, Stichting Ekopark, Lelystad and Platform Voor Belangen van de Consument (Platform BevaCo, Rotterdam) have signed these complaints in support. This market authorisation must not go ahead!

The complainants are wondering: 'How come 80-90% of the bee populations in the USA have died this spring?' The name given to this phenomenon is Colony Collapse Disorder (CCD). The US bee expert, Professor Eric Mussen of the University of California, attributes this to malnutrition. Bees are dependent for food on healthy pollen from which they extract cholesterol.

(See complaint <https://www.gentechvrij.nl/wp-content/uploads/2017/07/koolzaad-73-bezwaren.pdf>) and click on the link to the radio programme). Bees are indispensable for at least 100 crops. Albert Einstein once said: "If the bee disappeared off the face of the Earth, man would only have four years left to live." Nowadays, there is not a single scientist who can guarantee that GM crops are not harmful, and certainly not over the longer term.

It has only recently emerged from animal studies that, for example, Monsanto's GM corn MON863 shows kidney and liver toxicity. This maize has been in the food chain a long time.

See also: 'Monsanto's GM corn MON863 shows kidney, liver toxicity in animal studies' (via archive: [newstarget.com/021784](http://newstarget.com/021784) ) and [http://www.afa.com.au/news/n\\_news-1979.asp](http://www.afa.com.au/news/n_news-1979.asp) (via archive); see the excerpt at the end of this letter.

This is a literature study carried out by independent scientists. "Why on earth go to all the trouble of encrypting a crop if it can be grown the traditional organic way, without encryption or pesticides? The crops are being made resistant to herbicides by means of genetic manipulation. Moreover, oilseed rape is a crop which needs little in the way of pesticides." (See the complaint.) In view of these serious, substantiated complaints against the planned market authorisation of GT 73 GM oilseed rape, we ask you once again to urgently consider declaring the Netherlands a GMO-free country.

That would give organic and sustainable farming a chance to grow freely, without being contaminated with GM pollen. And it would mean that the soil would not be contaminated (hardly any research has been done into the effect of GM crops on the soil, even though it is urgently needed!). Organic farming is coming into its own and will be a niche market. And the Netherlands would be well-placed to reap the benefit.

Yours sincerely,

Miep Bos, visual artist and worried mother.

[miep@gentechvrij.nl](mailto:miep@gentechvrij.nl)

[www.gentechvrij.nl](http://www.gentechvrij.nl)

6-8-20 Commentary: We also wrote the following letter in 2007. We have not changed our mind since. Roundup is being banned everywhere because of its toxicity. The Municipality of Lelystad banned Roundup as long ago as 2015. You simply cannot authorise this oilseed rape! It's outrageous!

Lelystad, 3 July 2007.

To: Ms Jacqueline Cramer, Minister for Housing, Spatial Planning and the Environment. In person

The Hague

Open letter

Dear Minister,

As a housewife and as an artist, I am concerned because I heard from the Natural Law Party in 1996 that our food is being genetically manipulated. As I have a lactose allergy and am dependent on soya, I was seriously taken aback, because soya was the first food to be genetically manipulated and imported via the Port of Rotterdam.

Since then, I have taken various measures, including organising a number of international GMO-free travelling exhibitions, in which Wieteke van Dort, among others, has taken part. In 1996 I created the web site [www.gentechvrij.nl](http://www.gentechvrij.nl), which is still there for you to consult.

Moreover, in the course of the last ten years, I have sent complaints against the use of GM test fields to the Ministry of Housing, Spatial Planning and the Environment. My most recent complaint concerns market authorisation for Monsanto's genetically modified oilseed rape GT 73, which is intended to be used as feed for our cattle. 567 citizens and various foundations supported my complaint.

I was invited (the invitation was actually sent to 'Groep Bos', which is what your officials now call me) to attend a hearing on 10 May 2007 and say my piece.

My supporters and myself were sat around a conference table, and opposite us were representatives of your Ministry. Before I even had a chance to speak, the Chairman pointed out that, in our democracy, a private individual may read out a petition, but can no longer take the matter to a higher legal instance, because of the abolition of *actio popularis*, even if they have the backing of 567 citizens. More than five weeks later (I had been told it would be four weeks), I received the decision: the complaints had been declared unfounded. I thought I should relate this curious anecdote about my petition and your Ministry's deliberations.

Groep Bos writes:

The fine oilseed rape grains can enter the environment during transport, as Monsanto itself notes. Oilseed rape is native to the Netherlands. Unwanted GM oilseed rape plants can cross-breed with wild strains and give rise to "superweeds", thanks to their resistance to Roundup, etc. The superweeds pose a threat to the environment, because more and more powerful pesticides have to be used against them. They also pose a threat to both organic and conventional farming.

Your officials stated: "Plants of this type do not present any danger for organic farming because organic crops are not sprayed with glyphosate. In conventional farming, a different agent to glyphosate can be used." So, it's OK if their country is contaminated with superweeds which are resistant to Roundup or GM oilseed rape?

And yet, who hasn't heard the story of Percy Schmeiser, the Canadian farmer on whose land Monsanto's genetically modified oilseed rape was found? A court ordered Mr Schmeiser to pay compensation because he had sown Monsanto's "canola" GM oilseed rape without paying for it. Secondly, bees which visit this oilseed rape will become contaminated, and their honey can no longer be sold as EKO or even as conventional honey. Lastly, organic oilseed rape that has been contaminated with GM oilseed rape no longer qualifies for the EKO approval mark.

How can your official write such stuff?

Did you read it before dignifying it with your signature?

I am seriously considering taking the matter to the Council of State. This is possible thanks to a foundation which is a member of Groep Bos, which I am authorised to represent.

The last word on this GM oilseed rape GT 73 has not been spoken.

Yours sincerely,

Miep Bos, for Groep Bos

Lelystad

miep@gentechvrij.nl

Cc.: various media

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Excerpt [http://www.afaa.com.au/news/n\\_news-1979.asp](http://www.afaa.com.au/news/n_news-1979.asp)

FRANCE – GM CORN FEEDING STUDY New analysis of a rat feeding study with a genetically modified maize reveals signs of hepatorenal toxicity 15 March 2007 . Source: Archives of Environmental Contamination and Toxicology via AgNet Gilles-Eric Séralini (1,2) , Dominique Cellier (1,3) and Joël Spiroux de Vendomois (1) Committee for Independent Information and Research on Genetic Engineering CRIIGEN, Paris, France

(2) Laboratory of Biochemistry, Institute of Biology, University of Caen, Caen, France (3) Laboratory LITIS, University of Rouen, Mont-Saint-Aignan, France Received: 18 July 2006 Accepted: 20 November 2006 Published online: 13 March 2007

Abstract

Health risk assessment of genetically modified organisms (GMOs) cultivated for food or feed is under debate throughout the world, and very little data have been published on mid- or long-term toxicological studies with mammals. One of these studies performed under the responsibility of Monsanto Company with a transgenic corn MON863 has been subjected to questions from regulatory reviewers in Europe, where it was finally approved in 2005. This necessitated a new

assessment of kidney pathological findings, and the results remained controversial. An Appeal Court action in Germany (Münster) allowed public access in June 2005 to all the crude data from this 90-day rat-feeding study. We independently re-analyzed these data. Appropriate statistics were added, such as a multivariate analysis of the growth curves, and for biochemical parameters comparisons between GMO-treated rats and the controls fed with an equivalent normal diet, and separately with six reference diets with different compositions. We observed that after the consumption of MON863, rats showed slight but dose-related significant variations in growth for both sexes, resulting in 3.3% decrease in weight for males and 3.7% increase for females. Chemistry measurements reveal signs of hepatorenal toxicity, marked also by differential sensitivities in males and females. Triglycerides increased by 24-40% in females (either at week 14, dose 11% or at week 5, dose 33%, respectively); urine phosphorus and sodium excretions diminished in males by 31-35% (week 14, dose 33%) for the most important results significantly linked to the treatment in comparison to seven diets tested. Longer experiments are essential in order to indicate the real nature and extent of the possible pathology; with the present data it cannot be concluded that GM corn MON863 is a safe product.

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See also: Complaints 2007 <https://www.gentechvrij.nl/bezwaarschriften/bezwaren-2007/>  
Nederlands commentary by the CA:

#### CATEGORIES

The Dutch CA is of the opinion that the monitoring of GT73 oilseed rape should be continued, and should be expanded to include monitoring along transport routes (including roadsides and railway beddings) and transshipment areas. When GM oil seed rape is observed, *B. rapa* populations in the vicinity of the observed population should be monitored as well (CGM/130402-01;

<https://cogem.net/app/uploads/2019/07/170322-01-Advies-hernieuwing-vergunning-voor-import-van-de-gg-oilseed-rapelijn-GT73.pdf>

EN:

The spillage of seeds can give rise to oilseed rape populations along Dutch transport routes and in the vicinity of transshipment areas. Oilseed rape can cross-breed with its wild relative, field mustard (*Brassica rapa*). Until it has evidence to the contrary, the Netherlands' Committee on Genetic Modification (COGEM) cannot rule out the possibility of transgenic characteristics becoming "stacked" in *Brassica napus* and *Brassica rapa* as a result of 'gene flow.' A possible combination of transgenic properties or interaction between products of these transgenes could potentially have a harmful effect on the environment. This is why COGEM believes that imports of GM *Brassica napus* lines should be subject to compulsory monitoring at locations where there are most likely to be wild populations of *Brassica napus*, such as along railway lines. COGEM believes that a monitoring plan of this type must be put in place before the import authorisation for GT73 is renewed.

<https://cogem.net/publicatie/aanvullend-advies-post-market-environmental-monitoring-van-ms8xrf3xgt73-n-a-v-verschijnen-efsa-opinie/>

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#### 4. Conclusions and recommendations

Don't authorise it! We are also asking this on behalf of Stichting Ekopark Lelystad.

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**Organisation: The European GMO-free Citizens De Gentechvrije Burgers**  
**Country: The Netherlands**  
**Type: Others...**

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##### a. Assessment:

##### b. Food Safety Assessment:

##### Toxicology

18-8-2020 follow-up to our previous complaints and those of Stichting Ekopark Lelystad.

Poor-quality cattle feed

The market is being saturated with poor-quality, denatured cattle feed containing herbicide residues. The residues end up in milk and eggs, and hence in human food.

Attempts to trivialise the harm wrought by these residues won't wash. As a spokesperson for the Coberco dairy has said, dairy factories want milk without any foreign substances. Particularly in Germany. There is also the harm done by very small quantities of residue, e.g. brain damage in small mammals, which expresses itself in behavioural disorders (Prof. Fujii, Tokyo University.) We believe this milk to be absolutely unusable. Especially for babies.

GLA: *Brassica napus* contains a new protein, phosphinothricin-acetyl-transferase.

Thompson C.J. et al reported in 1987 that this protein also has glutamine acid as a substrate ("Characterisation of the herbicide resistance gene bar from *S.hygroscopicus*" in EMBO J. 6 9 2519-2523).

In an UNPUBLISHED report, Hoechst attempts to prove that this is NOT the case and that the only substrate is phosphinothricin.

Dr Arno Schulz "L- Phosphinothricin N-Acetyltransferase Characterisation". Hoechst Report no. 93-01 dd. 13-05-1993.

To this end, Dr Arno Schulz exposed mixtures of phosphinothricin and various amino acids to the action of acetyltransferase.

Dr Schulz detected only acetylated phosphinothricin.

We do not think that this is a valid argument for ruling out other amino acids as substrates for acetyltransferase because, in a mixture of acetylated amino acid and phosphinothricin, the phosphinothricin-acetyltransferase can use the acetyl group of the amino acid, thereby deacetylating it.

Without the presence of phosphinothricin, the acetyltransferase will acetylate the amino acid.

Thomson's observations remain fully valid, together with the attendant TOXICOLOGICAL CONSEQUENCES.

Moreover, we regard the toxicological evidence for the safety of *Brassica napus* with the new protein phosphinothricin-acetyltransferase and the glyphosate residues as insufficient at a time when the approach to toxicological research adopted by the Rowett Institute in Aberdeen is setting the trend for long-term feed tests and observations of all organs of the test animals: the brain, immune system, blood, stomach, small and large intestines, pancreas, liver, kidneys, etc.: not only in the test animals, but also in their offspring.

In our view, this consistent denial of new toxicological data on glufosinate-related brain damage is reprehensible. Two Japanese researchers (Fujii and Watanabe) have described the neurotoxicological effect of GLA and apoptosis in embryos even at VERY SMALL doses.

#### Resistance

Because of the resistance, the herbicide is stored in the plant in the form of an acetylated product, from which the herbicide is re-released in the gastro-intestinal tract of warm-blooded animals. This has been demonstrated in rats, chickens and goats (M.N. Huang et al: Metabolism of 14 C-Glufosinate and in 14 C—N-Acetyl Glufosinate in lactating goats and laying hens, Agrevo, Frankfurt), and this herbicide also ends up in the human food chain, with all the attendant consequences.

EFSA must definitely make this assessment.

EFSA's claim that it is not its task to make such an assessment is based on a misconception: we are dealing here with processes which take place inside the plant.

#### Glyphosate

This glyphosate-resistant *Brassica napus* also contains glyphosate residue as a protein adduct. The herbicide is released in the intestinal tract.

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