

## Comments from the public : Soybean A2704-12

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**Organisation: Wieteke van Dort Productions**

**City: Den Haag**

**Country: The Netherlands**

**Type: Individual**

**Public: Yes**

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**a. Assessment:**

### **6. Labelling proposal**

This is so ridiculous, these genetically modified organisms. There must be a secret behind it. In my opinion all big industries need to dump their poison, and found a way to get rid of it. Create a plant which is resistant to the poison and they at once have a legal way to do so. It is a shame to change plants or animals. The creation of our world is perfect and let us allow certain groups to destroy it.

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**Organisation: Individual**

**City: Helsinki**

**Country: Finland**

**Type: Individual**

**Public: Yes**

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**a. Assessment:**

### **6. Labelling proposal**

Tutkimukset ovat osoittaneet, että muuntogeeniset tuotteet ovat esim. tappaneet mehiläisiä normaalia enemmän. Eikö meidän tulisi ottaa tämä tutkimustulos vakavasti ja luopua muuntogeenisistä tuotteista?

It has been shown by researches that the GM products are a reason for the unusual big amount of deaths of bees. Shouldn't we take this research result seriously and give up the GM products?

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**Organisation: the Central Union of Agricultural Producers and Forest Owners (MTK)**  
**City: Kokkola**  
**Country: Finland**  
**Type: Individual**  
**Public: Yes**

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**a. Assessment:**  
**5. Others**

I propose, that all products, where genetical modification has been used, would be marked, so that consumers could make their own decision in this subject when they choose products to buy. Otherways almost all products will be genetically modified in the future, because they are cheaper to produce, and consumers tend to choose cheaper products. I propose, that this kind of marking would be used until genetical modification will be proved safe to people and environment.

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**Organisation: None**  
**City: Kajaani**  
**Country: Finland**  
**Type: Individual**  
**Public: Yes**

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**a. Assessment:**  
**5. Others**

In each food product, where GM soy is involved, should be a label telling this. People must have a chance to decide what to buy -GM free products or GM consisted products.

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## **6. Labelling proposal**

EU shouldn't approve this. Man is not a God -even some of us nowadays seem to think so. In the long run there might be effects to nature of which we don't have a clue yet. Remember the "safe" use of DDT at 60's? But THIS issue is a lot bigger, as we're talking about genes. When these genes drift into the soil it's impossible to take them away.

Absolutely EU's decision makers should be "brave" and say no to use of this soy as well as to import of the meat if animals are fed with gene manipulated soy. Total prohibition is the only choice! We shouldn't think only economical issues, now is the time to start thinking the environment. At the latest!!

....won't humans ever learn????

Please keep EU GM -free!

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**Organisation: none**

**City: Helsinki**

**Country: Finland**

**Type: Individual**

**Public: Yes**

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**a. Assessment:**

**6. Labelling proposal**

I wouldn't say that I'm in love with my liver but we have come a long way together. It would be stupid of me to eat things that contain something that might/will change the shape of my internal organs just for better profits for someone I don't even know. Science always comes behind. Therefore I demand to know what I will put in my mouth so that the risk is mine only.

Please don't force me to fear my food..

Somehow I'm thinking asbestos right know..

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**Organisation: individual**

**City: Helsinki**

**Country: Finland**

**Type: Individual**

**Public: Yes**

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**a. Assessment:**

**6. Labelling proposal**

1: GMO should not be permitted to be produced or sold in EU.

2: If they are produced or sold, all the product packages sold to the citizens should be marked according to the use of GMO (in the case GMO are used in the production). This applies to the vegetarian food, and animal-based products where GMO are used to feed the animals as well as possible other products.

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**Organisation: n/a**  
**City: Helsinki**  
**Country: Finland**  
**Type: Individual**  
**Public: Yes**

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**a. Assessment:**  
**Others**

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## **6. Labelling proposal**

I strongly believe that the consumers should have the right to decide what they eat. This is possible only if the packaging clearly indicates any and all GM materials used during the production. This also includes the information about possible GM products used in the animal feed with meat products.

If anything our past history teaches that many products that were in their time broadly labelled as safe and healthy were later found to be just the opposite:

- In the early 1900s radioactivity was considered to be good for human health and consumers were encouraged to use various products containing radioactive materials such as radium, radon, uranium and thorium.
- Public opinion about DDT pesticide was originally that it harmless for humans and as such it was widely used around and on people. The wide ranging effects were discovered only later.
- For a long time smoking was considered harmless and sometimes even health improving habit.

My point here is that we don't know enough about long term effects of consuming GM food products. Their true effect might not be apparent until decades of everyday consumption and then it might already be too late. We should err on the side of caution and at very least give the consumers all the information they need to choose what food products they consume.

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**Organisation: Citicen**  
**City: Lappeenranta**  
**Country: Finland**  
**Type: Individual**  
**Public: Yes**

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**a. Assessment:**  
**Allergenicity**

For some allergic persons GMO can cause risk of several injury or death.

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**3. Environmental risk assessment**

Hybrids can cause ecological problems. GM agricultural plants can be dangerous if they are good competitors (for example enhanced resistance for herbivores) and fertile.

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**5. Others**

Consumer should have possibility to choose to buy or not to buy GM victuals no matter his or her reasons (allergological, ecological, ethical etc.). Because of that reason it should be mandatory to label victuals if GMO has been used in them or at least there should be free mark for GMO free victuals and misuse of that mark should be punished strictly. I prefer former system that victuals where GMO has been used should be labeled. Lobbying is easy for big firms and they can lobby that GMO labeled food is safe even if it has a mark includes GMO. All firms who are using GM products would stand on the same line. Seriously allergic persons would not have to be afraid of what to eat. In voluntary labeling system this information which would be essential for a few could be missing. I suppose that not all people are afraid for GMO labeled victuals and those how are would buy victuals where GMO has not been used, if manufacturer could not confirm them for the safety of GMO.

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**Organisation: individual**

**City: Helsinki**

**Country: Finland**

**Type: Individual**

**Public: Yes**

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**a. Assessment:**

**3. Environmental risk assessment**

The risks to the ecosystem from GMO plants through pollination and by other means seems to be inadequate at the moment. The recent generation should not take risks that the next generations of people might be adversely affected through the loss of genetic diversity (loss of original, natural plant communities by uncontrollable cross-pollination).

The knowledge of today will most probably accumulate in the future and thus decisions of releasing GMO seeds and plants into our common environment should not be made without

truly long-lasting testing and analysis. The pressure from the GMO industry should be ignored and the safety of the environment considered as priority within EU.

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#### **4. Conclusions and recommendations**

GMO soybeans should not be let to enter the EU market because of the unknown risks and unproved safety in the natural environment.

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#### **5. Others**

If allowed to enter the common market products that contain or that have been procuded by using GMO products shall contain a clear indicator of the matter, i.e. on the package labelling the use of GMO content should be marked. This should ALSO apply to products that are derived higher in the food chain, such as meat, poultry and fish if those have been fed with GMO products.

This is to safeguard the consumers right to be aware of the content of the food that is put to market and to make purchase decision upon adequate information. At the moment it is the producer that has the privilege and right not to inform customers if GMO products have been used in the (meat, pork etc.) production. The market information is deficient at the moment from the perspective of the consumer.

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**Organisation: None**

**City: Jyväskylä**

**Country: Finland**

**Type: Individual**

**Public: Yes**

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**a. Assessment:**

#### **6. Labelling proposal**

Not too long ago radioactivity and asbestos were both assumed to be perfectly safe. Cocaine was used as medicine, and dumping mercury barrels in the bottom of the Baltic sea was a widely used and accepted practice. Even Einstein later had regrets about his accomplishments. History has numerous examples of how scientists have celebrated a breakthrough only to admit later that all went horribly wrong.

Knowledge and technology have always been modern and up to date, but they are never perfect.

Evolution is a highly effective process of optimisation. If GM-products were in fact superior to conventional organisms, one should ask why nature did not make it that way in the first place.

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**Organisation: NA**

**City: Espoo**

**Country: Finland**

**Type: Individual**

**Public: Yes**

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**a. Assessment:**

**5. Others**

I hope EU will require all Genetically Modified Organisms (GMO) to be labelled as such on all foods and products that have directly or indirectly been manufactured with GMOs. As a customer I want to select the food I eat with my own criterias. If I don't know how the food is being manufactured I cannot do that.

I propose three different labels: "GMO", "no GMO", and "might include GMO". All the sold food (in markets and restaurants, including but not limited) must have one of the three labels.

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**Organisation: IT**

**City: Tampere**

**Country: Finland**

**Type: Individual**

**Public: Yes**

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**a. Assessment:**

**3. Environmental risk assessment**

Gmo-paneelin mukaan "riski, että soija leviäisi luonnossa on erittäin pieni, sillä kyseistä muuntogeenistä soijaa ei tulla viljelemään Euroopassa".

Miksi riskiä ajatellaan vain Euroopan kannalta? Jossainhan muuntogeenistä soijaa joudutaan kuitenkin viljelemään. Mielestäni tällainen ajattelu on epäeettistä. Ei voida ajatella, että kunhan muuntogeenistä soijaa ei jouduta viljelemään Euroopassa, kaikki on hyvin. Vastuu täytyy kantaa globaalisti.

According to the GMO Panel the likelihood of the spread and establishment of soybean is very low, because the GM soybean is not intended to be cultivated in Europe".

Why to think about the risk only from the European point of view? Somewhere the GM soybean is to be cultivated. To my mind this kind of thinking is unethical. One must not think that everything is well, when the GM soybean shall not be cultivated in Europe. One should take the global responsibility.

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#### **4. Conclusions and recommendations**

Mielestäni muuntogeenistä soijaa ei saa tuoda Eurooppaan ja käyttää täällä. Ei voida ajatella, että gmo-soijaa voidaan käyttää täällä ja muut maanosat joutuvat kantamaan viljelemisestä muulle kasvustolle ja luonnolle aiheutuvan riskin.

In my opinion the GM soybean is not allowed to import to Europe and to use here. One cannot think that GM soybean could be used here, and the risk for other plants and nature caused by its cultivation is fallen to the other continents.

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**Organisation: I'm a private person, not organized in anything and unemployed**

**City: Viiala**

**Country: Finland**

**Type: Individual**

**Public: Yes**

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**a. Assessment:**

**b. Food Safety Assessment:**

**Toxicology**

I think that gm-soy will encourage farmers to use more glyfosat or other toxic stuff when growing soy. And afterwards they test if gm-technics can be used in other farming. (Maybe there are many already?) I assume that we consumers have right to demand that farmers and pigfarmers who don't use gm-modifications mark their products so we can choose not to use food we don't trust!

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#### **6. Labelling proposal**

Fom economical aspect I assume that when cheap food makes faster growing of animals, there are some scientific results saying that the cell embraces(?)of too fast grown vegetable or



animal became destroyed (my english is too weak to explain it) but you certainly know this...  
So far I'm not sure what effect this makes to us, so I do my best to seek near produced and ecological food.

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**Organisation: consiglio dei diritti genetici**

**City: Rome**

**Country: Italy**

**Type: Non Profit Organisation**

**Public: Yes**

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**a. Assessment:**

**Molecular characterisation**

La documentazione relativa alla caratterizzazione molecolare della pianta GM risulta accurata e integralmente consultabile e non si rilevano incongruenze. Tuttavia, non sono fornite evidenze che a livello del sito di inserzione nel genoma della pianta non si siano prodotti riarrangiamenti, delezioni e/o inserzioni. Sulla base di questi dati, al fine di escludere possibili effetti secondari non prevedibili, determinati da interazioni tra nuovi elementi genici introdotti o modificati, le successive analisi del prodotto finale (composizionali, di allergenicità e tossicità, delle performance agronomiche) sono fondamentali. A nostro avviso, per ridurre i potenziali rischi derivanti dall'inserzione di DNA di funzione non nota, sarebbe opportuno migliorare la selezione delle piante trasformate, scegliendo quelle con il minor numero di elementi di DNA non necessari, prima di arrivare alla fase di commercializzazione del prodotto. Questa è una raccomandazione di carattere generale, dato che in quasi tutti gli OGM destinati alla commercializzazione e ottenuti tramite la tecnica biolistica, risultano cointegrati frammenti di DNA di diversa origine (cloroplastica e mitocondriale) e dimensione.

Documents about the molecular characterisation of the GM plant are careful and wholly consultable and without incongruities. However, evidences are not given about the fact that there were no rearrangements, deletions and/or insertions made in the plant genome at the level of the insertion site. On this basis, in order to leave out minor effects that could be not predictable, due to the interactions between new genic elements which could have been introduced or modified, the following tests of the final product (regarding the composition, the allergenicity and toxicology and the agronomic performance) are fundamental. In our opinion, in order to reduce potential risks coming from DNA insertion of a function that is not well known, it would be right to better the selection of transformed plants, choosing the ones carrying the lower number of DNA elements which are not required, before marketing a product. This is a broad level recommendation, because mostly all the OGM designed for marketing and obtained by biolistic technique show integrated DNA fragments, with different dimensions and origin, both chloroplastic and mitochondrial.

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**Comparative analysis (for compositional analysis and agronomic traits and GM phenotype)**

Il materiale esaminato per la composizione è stato sottoposto ad analisi ANOVA, che ha dimostrato variazioni statisticamente significative tra soia A2704-12 e soia non GM nei livelli di svariati componenti. Il GMO panel sottolinea che tali differenze si sono presentate solo in alcuni dei siti coltivati e che laddove la coltivazione è stata condotta per due anni consecutivi solo arginina e acido linoleico hanno costantemente presentato variazioni statisticamente significative; inoltre, le differenze osservate rientrano nell'ambito dei valori di variabilità naturale riportati in letteratura. Bisogna però considerare che queste modificazioni composizionali possono sottendere alterazioni delle vie metaboliche della pianta GM. Sembra quindi necessaria una valutazione più approfondita delle sue caratteristiche, allo scopo di escludere la presenza di metaboliti al momento sconosciuti, non considerati o non adeguatamente esaminati.

An analysis ANOVA of compositional parameters has been provided. The analysis showed statistically significant differences in the level of several compounds between soybean A2704-12 and non-transgenic counterpart. The GMO panel points out that these differences were present only in material from few locations, and when the field trials were carried out during two consecutive years only arginine and linoleic acid constantly showed statistically significant differences. Furthermore, the observed differences were within the ranges of natural variation published in literature. However, it must be considered that these compositional modifications may be due to some change in the biochemical pathway of the GM plant. Therefore it seems necessary a deeper evaluation of the characteristics of this product, with the aim of excluding the presence of currently unknown or unconsidered or not adequately examined metabolites.

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## **b. Food Safety Assessment: Toxicology**

Non sono state effettuate analisi utilizzando l'intero prodotto GM come alimento, nonostante che i dati ricavati dall'analisi composizionale evidenzino la presenza di differenze statisticamente significative tra soia A2704-12 e soia non GM. In particolare, non è stato eseguito lo studio di alimentazione a 90 giorni sui roditori, che l'EFSA1 stessa prevede, nel caso in cui la pianta GM abbia subito modifiche sostanziali.

No additional safety studies on the whole GM food/feed were made, yet data from compositional analysis show statistically significant differences between soybean A2704-12 and non-transgenic counterpart. Particularly, no 90-day study on rodents was provided, required by EFSA1 when the GM plant undergoes substantial modifications.

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## **Allergenicity**

La valutazione di sicurezza allergologica è basata unicamente su deduzioni. Dati i risultati dell'analisi composizionale e considerata l'assenza di un esame sulle potenzialità tossiche dell'intera pianta, così come prescritto dall'EFSA, appare necessario eseguire test che verifichino l'effettiva assenza di rischio allergologico della pianta GM nel suo complesso.

The potential allergenic effects are evaluated only on deductions. Considering the results of the compositional analysis and the absence of an evaluation about potential toxicological effects of the whole plant (as EFSA requires), we believe that analysis should be conducted to check the real absence of allergological risk of the whole GM plant.

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### 3. Environmental risk assessment

Nella notifica non si richiede l'autorizzazione per la coltivazione della soia A2704-12 in Europa, ma piante di soia GM volontarie potrebbero svilupparsi anche da semi perduti durante le operazioni di trasporto, stoccaggio, trasformazione e uso a livello di fattoria. Negli ambienti agricoli in cui viene usato il glufosinato d'ammonio queste piante volontarie avrebbero un considerevole vantaggio selettivo. Il trasferimento genetico verticale, pur essendo basso (considerando una frequenza d'impollinazione incrociata minore dell'1%), sarebbe comunque sufficientemente alto per creare problemi alle produzioni biologiche. Il rischio è potenzialmente più elevato per l'Italia, essendo il maggior produttore europeo di soia e un paese dal clima abbastanza mite. Per quanto detto riteniamo necessario un piano di monitoraggio caso-specifico, predisposto per controllare l'eventuale flusso genico derivante dal rilascio accidentale di semi e dallo sviluppo di piante di soia GM. Ciò andrebbe fatto considerando principalmente i siti in cui vengono utilizzati semi vitali della soia A2704-12 ed eventualmente erbicidi a base di glufosinato, a maggior ragione se posti in aree di produzione di soia biologica. Infine, nell'ipotesi di piano proposta per la sorveglianza generale dovrebbe essere considerato soprattutto il monitoraggio a livello di azienda agricola.

In the notification no authorization is required for the farming of soybean A2704-12 in Europe, but spontaneous GM soybean plants could grow also from lost seeds during the transport, stocking, transformation and use in the farm environment. In the agricultural habitat where the glufosinate ammonium is used, these spontaneous plants would get a considerable selective benefit. The vertical genetic transfer, even if low (considering a crossed pollination frequency smaller than 1%) would be high anyway to create problems to the biologic production. The risk is potentially higher in Italy, being Italy the biggest European soybean producing country and considering its warm weather. Considering these remarks, we think that a monitoring plan, for each particular case, is required to control the possible genic transfer coming from the casual discharge of seeds and the development of GM soybean plants. The monitoring should be made mainly considering sites where vital A2704-12 soybean seeds are used, and where glufosinate-based herbicides are used, especially when in biological soybean production sites. At last, speaking about the proposal for general surveillance, the monitoring on a agricultural farm level should be considered above all.

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**Organisation: Individual**  
**City: Singapore**  
**Country: Non EU**  
**Type: Individual**  
**Public: Yes**

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**a. Assessment:**  
**Molecular characterisation**

In the molecular characterisation, evidences are not given about the fact that there were no rearrangements, deletions and/or insertions made in the plant genome at the level of the insertion site. On this basis, in order to leave out minor effects that could be not predictable, due to the interactions between new genic elements which could have been introduced or modified, the following tests of the final product (regarding the composition, the allergenicity and toxicology and the agronomic performance) are fundamental.

In order to reduce potential risks coming from DNA insertion of a function that is not well known, it would be right to better the selection of transformed plants, choosing the ones carrying the lower number of DNA elements which are not required, before marketing a product. This is a broad level recommendation, because mostly all the OGM designed for marketing and obtained by biolistic technique show integrated DNA fragments, with different dimensions and origin, both chloroplastic and mitochondrial.

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**Comparative analysis (for compositional analysis and agronomic traits and GM phenotype)**

An analysis ANOVA of compositional parameters has been provided. The analysis showed statistically significant differences in the level of several compounds between soybean A2704-12 and non-transgenic counterpart. The GMO panel points out that these differences were present only in material from few locations, and when the field trials were carried out during two consecutive years only arginine and linoleic acid constantly showed statistically significant differences. Furthermore, the observed differences were within the ranges of natural variation published in literature.

However, it must be considered that these compositional modifications may be due to some change in the biochemical pathway of the GM plant. Therefore it seems necessary a deeper evaluation of the characteristics of this product, with the aim of excluding the presence of currently unknown or unconsidered or not adequately examined metabolites.

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**b. Food Safety Assessment:**  
**Toxicology**

No additional safety studies on the whole GM food/feed were made, yet data from compositional analysis show statistically significant differences between soybean A2704-12 and non-transgenic counterpart. Particularly, no 90-day study on rodents was provided, required by EFSA2 when the GM plant undergoes substantial modifications.

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## Allergenicity

The potential allergenic effects are evaluated only on deductions. Considering the results of the compositional analysis and the absence of an evaluation about potential toxicological effects of the whole plant (as EFSA requires), we believe that analysis should be conducted to check the real absence of allergological risk of the whole GM plant.

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### 3. Environmental risk assessment

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The vertical genetic transfer, even if low (considering a crossed pollination frequency smaller than 1%) would be high anyway to create problems to the biologic production. The risk is potentially higher in Italy, being Italy the biggest European soybean producing country and considering its warm weather.

Considering these remarks, we think that a monitoring plan, for each particular case, is required to control the possible genic transfer coming from the casual discharge of seeds and the development of GM soybean plants.

The monitoring should be made mainly considering sites where vital A2704-12 soybean seeds are used, and where glufosinate-based herbicides are used, especially when in biological soybean production sites. At last, speaking about the proposal for general surveillance, the monitoring on an agricultural farm level should be considered above all.

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**Organisation: none**

**City: Kokkola**

**Country: Finland**

**Type: Individual**

**Public: Yes**

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**a. Assessment:**

#### 4. Conclusions and recommendations

GM soy is clearly unsafe. there have been numerous non-monsanto studies that point to this incontrovertible fact. you must have read irina ermakova's research findings on the issue. The very nature of genetic tampering is fraught with risks and uncertainties that we really don't need and, by their very nature, cannot predict or even pinpoint after years of widespread use. but by then it'll be too late. there have never been any clinical tests on humans regarding GM

soy. we don't know how even moderate consumption of GM soy that is cooked in different ways can affect humans. there are plenty of small, independent studies that strongly suggest that transgenes do have an adverse effect on animals and that they can be unpredictably transferred to humans.

the principle of substantial equivalence is simply an insult to intelligence that the EU seems to have accepted from the US but, for the sake of its citizens, must now reject in total. Tests will only find something or nothing that is being looked for. if the test parameters are narrow, there's little chance of discovering anything anomalous. Full-scale tests must be performed by independent EU laboratories and not by the corporation that is requesting market approval.

Monsanto is pushing for GM soy because it's the only way it can extend control and hence derive direct profits from what is inherently a natural product that is part of the common wealth. That is the only reason why GM soy even exists. GM soy does not reduce herbicide use (if anything, benbrook's studies have shown GM soy to increase it!), it doesn't have greater yields than conventional varieties and it does not address the fundamental issues underlying hunger in poor nations. Monsanto already controls so much of the global soy market, both GM and conventional which allows it great leverage in pushing its products. please, please do not allow GM soy to encroach further into the European food and agriculture systems and endanger the health of everyone.

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**Organisation: Individual**

**City: Porvoo**

**Country: Finland**

**Type: Individual**

**Public: Yes**

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**a. Assessment:**

## **6. Labelling proposal**

Kuluttajilla tulee olla oikeus valita, syövätkö geenimanipuloitua ruokaa niin kasveja kuin tällaisella ruoalla syötettyjä eläimiäkin. Geenimanipuloidut tuotteet aiheuttavat luonnon ryöstöviljelyä (brasilian) ja sitä kautta vahingoittavat maailman tasapainoa. Kaikkia vaikutuksia luonnon monimuotoisuuteen ei ole tutkittu, miten esim. estetään, että viljelyltä leviää siemeniä/siitepölyä ympäristöön ja miten luonnonkasvit reagoivat, tuleeko geenimanipuloituja ihmiselle haitallisia kasveja. Syystä, että geenimanipuloidut tuotteet tulevat halvemmaksi ne jyräävät markkinoilta muut vaihtoehdot ja vääristävät kilpailua, varsinkin, jos niitä ei voi tietoisesti välttää. Puhtaan ravinnon ja maapallon puolesta.

Consumers should have a right to choose, if they eat GM food both plants and animals, fed by this kind of feed. GM products are leading to overexploitation (Brazil) and throughout that damaging the global balance. All the influences to the natural diversity has not been explored, for example how to prevent the spreading of seeds/pollution into the environment, and how do the wild plants react, do they become as GM plants which are harmful to human beings. For

the reason that GM products will become cheaper, they will roll other alternatives from the market and distort the competition, especially if they are not consciously avoided. For the clean food and the globe.

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**Organisation: none**

**City: Sipoo**

**Country: Finland**

**Type: Individual**

**Public: Yes**

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**a. Assessment:**

**3. Environmental risk assessment**

The risk of spreading genetically modified organisms to nature is enormous. There's no way of getting the genetically modified material out of the nature once it's there. It's a total fool's game to take the risk. Consumers don't want to eat genetically modified food, so why do we have to take this enormous risk? Who wants it?