

Comments from the public: GT73 oilseed rape

Organisation: The European GMO-free Citizens, Consumers Platform

Country: The Netherlands

Type: Others...

a. Assessment:

Molecular characterisation

See Others

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

See Others

b. Food Safety Assessment:

Toxicology

12 december 2009: Research Paper A Comparison of the Effects of Three GM Corn Varieties Mon 810, Mon 863 and Roundup herbicide absorbing NK 603 on Mammalian Health. 1. CRIIGEN, 40 rue Monceau, 75008 Paris, France 2. University of Rouen LITIS EA 4108, 76821 Mont-Saint-Aignan, France 3. University of Caen, Institute of Biology, Risk Pole CNRS, EA 2608, 14032 Caen, France <http://www.biolsci.org/v05p0706.pdf>

Allergenicity

12 december 2009: Research Paper A Comparison of the Effects of Three GM Corn Varieties Mon 810, Mon 863 and Roundup herbicide absorbing NK 603 on Mammalian Health. 1. CRIIGEN, 40 rue Monceau, 75008 Paris, France 2. University of Rouen LITIS EA 4108, 76821 Mont-Saint-Aignan, France 3. University of Caen, Institute of Biology, Risk Pole CNRS, EA 2608, 14032 Caen, France <http://www.biolsci.org/v05p0706.pdf>

Nutritional assessment

12 december 2009: Research Paper A Comparison of the Effects of Three GM Corn Varieties Mon 810, Mon 863 and Roundup herbicide absorbing NK 603 on Mammalian Health. 1.

CRIIGEN, 40 rue Monceau, 75008 Paris, France 2. University of Rouen LITIS EA 4108, 76821 Mont-Saint-Aignan, France 3. University of Caen, Institute of Biology, Risk Pole CNRS, EA 2608, 14032 Caen, France <http://www.biolsci.org/v05p0706.pdf>

Others

On the 27th of March 2007 I wrote the following:

BEZWAARSCHRIFT

Lelystad, 27 maart 2007.

Minister J. M. Cramer

p/a Bureau GGO

Postbus 1

3720 BA Bilthoven

Geachte mevrouw Cramer,

Betreft; bedenkingen en bezwaar tegen het voornemen van een markttoelating te weten;

Roundup Ready (glyphosate tolerant) oilseed rape, event GT73

beschikking kenmerk DGM/SAS/ C/NL/98/11

Monsanto

De genetisch gemodificeerde organismen die als product of in een product in de handel worden gebracht ten behoeve van import, verwerking en toepassing als veevoer (geen teelt) zijn korrels van koolzaad (Brassica napus L.) met tolerantie voor het herbicide glyfosaat, afgeleid van B. napus lijn GT73 die met behulp van Agrobacterium tumefaciens is getransformeerd met de vector PV-BNGT04.

(tekst uit de Kennisgeving van de Beschikking, gepubliceerd in de Volkskrant van 28-02-2007).

Wij willen niet dat dit gentech koolzaad , elk ander gentech gewas , dito zaden of andere afleidingen daarvan, geïmporteerd, op de markt gebracht, gecultiveerd (aangeplant) of verhandeld zullen worden in Nederland . Nederland moet gentechvrij blijven , zodat het milieu gespaard blijft van ongewilde vermengingen of uitkruisingen van biologisch -, traditioneel - en gentech zaad en pollen, afleidingen daarvan of andere onvoorziene gebeurtenissen. De biologische - en traditionele landbouw kunnen dan blijven voortbestaan. En dat de veestapel en wij niet bloot staan aan onverwachte consequenties die inherent zijn aan het planten, verhandelen en consumeren (gezondheid!) van deze gentech gewassen, nu en in de toekomst. Wij zijn als consumenten, Stichting Ekopark, Stichting VoMiGEN, Platform Belangen van Consument (BeVaCo) en boeren, belanghebbenden.(zie voor uitleg blz. 2).

25. Information on the safety of the GMHP to animal health, where the GMHP is intended to be used in animal feedstuffs, if different from that of the recipient/parental organism(s)

There is no difference between GT73 and the recipient organism in terms of safety to animals (See question 24). Van; SNIF - Placing on the market Roundup Ready oilseed rape derived from line GT73 Blz. 15

<http://gmoinfo.jrc.it/csnifs/C-NL-98-11.pdf>

Dit bestrijden we. Dit koolzaad zal worden gebruikt als veevoer. Dit mag absoluut niet gebeuren, omdat na de koude persing van het koolzaad er in het veevoer nog steeds herbicidenresiduen blijven (de gen-producten gaan meestal ook niet kapot), welke via vervoeding in de menselijke voedselketen komen.

Dit koolzaad is dus absoluut niet gelijk aan "conventioneel koolzaad".

Tijdens een symposium in New Orleans heeft men bekend gemaakt, dat via gelabelde stof, meer dan 90% van de toegepaste herbicide in het spijsverteringskanaal van het vee weer teruggevormd wordt in de originele herbicide. (New Orleans 25 maart 1996.)

Dat lijkt ons niet gezond voor het vee en wij willen geen gen-producten en herbiciden op ons bord.

En daarom zijn consumenten, Platform Belangen van Consument (BeVaCo, zie het bijgevoegd bezwaarschrift) en Stichting VoMiGEN, die ook consumenten vertegenwoordigt, belanghebbenden.

Ondertekenaars hebben tevens ethische en/of religieuze bedenkingen: Meerdere ondertekenaars vinden het niet ethisch te knippen en plakken in het DNA, de blauwdruk van het leven, die door God geschapen is. Heeft u dat meegenomen in uw overwegingen?

(9) Respect for ethical principles recognised in a Member State is particularly important. Member States may take into consideration ethical aspects when GMOs are deliberately released or placed on the market as or in products . (DIRECTIVE 2001/18/EC of 12 March 2001).

http://europa.eu.int/eur-lex/pri/en/oj/dat/2001/l_106/l_10620010417en00010038.pdf

De fijne korrels van de koolzaad kunnen tijdens het transport in het milieu terecht komen, zoals Monsanto zelf opmerkt. Koolzaad is hier een inheemse plant. Ongewilde gentech koolzaadplanten en uitkruising met wilde varianten, die "superonkruiden" kunnen worden, door bestand te worden tegen o.a. Roundup kunnen het resultaat zijn. Dit vormt een bedreiging voor het milieu, omdat meer en zwaardere bestrijdingsmiddelen moeten worden gebruikt tegen dit superonkruid . Tevens vormt één en ander een gevaar voor de biologische- en gangbare landbouw. Stichting EKOpark en de (biologische) boeren zijn dus ook belanghebbenden.

Therefore an unintended release would be more likely to occur during import, processing and transportation of GT73 grain. Van; SNIF - Placing on the market Roundup Ready oilseed rape derived from line GT73 Blz.5

<http://gmoinfo.jrc.it/csnifs/C-NL-98-11.pdf> Wij verwijzen hierbij naar

(6) Under the Treaty, action by the Community relating to the environment should be based on the principle that preventive action should be taken.

En

(7) It is necessary to approximate the laws of the Member States concerning the deliberate release into the

environment of GMOs and to ensure the safe development of industrial products utilising GMOs. En naar

(8) The precautionary principle has been taken into account in the drafting of this Directive and must be taken into account when implementing it.

(DIRECTIVE 2001/18/EC of 12 March 2001).

http://europa.eu.int/eur-lex/pri/en/oj/dat/2001/l_106/l_10620010417en00010038.pdf

The use of GT73 for oilseed rape production would enable the farmer to utilize Roundup herbicide for effective control of weed pests and to take advantage of this herbicide's environmental and safety characteristics.

Van; SNIF - Placing on the market Roundup Ready oilseed rape derived from line GT73 Blz. 12

<http://gmoinfo.jrc.it/csnifs/C-NL-98-11.pdf> Roundup en glyfosaat zijn helemaal niet zo milieuvriendelijk en veilig, zie bijlage 1.

Koolzaad is een relatief milieuvriendelijk gewas, het behoeft weinig bestrijdingsmiddelen. (Dagblad De Stentor, Spectrum 17-03-2007).

Wat verandert er in een Roundup Ready gewas?

In zo'n gewas, Roundup Ready soja, zijn veranderingen gevonden in de concentratie van stoffen die door dit enzym mogelijk gemaakt worden. Dit gebeurt vooral als de plant met glyfosaat wordt bespoten. In de toelatingsprocedure is geen rekening gehouden met het feit dat de plant door bespuiting een andere samenstelling krijgt: ze hebben toen alleen metingen bekendgemaakt aan de onbespoten plant. Er zijn mensen die aannemen dat dit bewust is gebeurd, om de indruk te wekken dat de gemanipuleerde soja 'wezenlijk gelijkwaardig' is aan gewone soja (o.a. Prof. Benbrook).

Van;

http://www.platformgentechnologie.nl/genetech/maatschappelijk_debat/De%20complexiteit%20van%20genen.doc

Survivability

Laboratory and field studies have been conducted to determine whether GT73 the survival and/or over-wintering characteristics of GT73 had been improved, which could increase the potential of GT73 to become a weed.

Based on results obtained in various agricultural environments, it is concluded that there is no difference in survivability between GT73 and conventional oilseed rape.

Van; SNIF - Placing on the market Roundup Ready oilseed rape derived from line GT73 Blz. 14, <http://gmoinfo.jrc.it/csnifs/C-NL-98-11.pdf> De winters in Nederland en Europa worden warmer en het is meer dan waarschijnlijk dat planten nu wel zullen overleven.

No to GM Oilseed Rape GT73 Monsanto has applied to import its GM oilseed rape GT73 into Europe for use in animal feed and processing. The Scientific Panel on GMOs of the European Food Safety Authority has given it a favourable opinion, and there will soon be a vote on it at the Council of Ministers. Here's a description of what it is and why it should be rejected . Prof. Joe Cummins , Dr. Mae-Wan Ho and Lim Li Ching

Zie ook <http://www.i-sis.org.uk/NTGMORGT73.php> Bijlage 4

De bovenstaande link leidt naar de commentaren van ISIS.org op GT73 en gelieve u in het geheel te lezen en als ingelast te beschouwen. Deze webpagina is uitgeprint en meegestuurd.

Fragment; An application for the import and use of GT73, excluding cultivation, was submitted in 1998 to the competent authority of the Netherlands . It gave this application a favourable opinion, and in January 2003 recommended that GT73 be approved. Several member States raised questions, including the UK , via its Advisory Committee on Releases to the Environment (ACRE) [4]. One of the concerns related to increased liver weights in rats fed GT73, compared with controls (see later).

U gelieve het onderstaande I-SIS Report eveneens als ingelast te beschouwen. ook uitgeprint en meegestuurd. Bijlage 5

GM Food Nightmare Unfolding in the Regulatory Sham

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Abstract

Our regulators are ignoring the precautionary principle, manipulating and corrupting science, sidestepping the law, and helping to promote GMOs in the face of massive public opposition and damning evidence piling up against the safety of GM food and feed

http://www.i-sis.org.uk/pdf/GM_Food_Nightmare_Unfolding.pdf

•Monsanto's Roundup Ready soya , commercially grown for years, was the only crop to be independently checked by molecular methods last year. Not only is the gene order of the insert found to be scrambled, the plant genome at the site of insertion is also scrambled, and there is a 534 bp fragment of unknown origin in there as well [27]. All very different from the original data provided by Monsanto . <http://www.i-sis.org.uk/Scotland2.php> Kunt u bewijzen dat dit Roundup Ready gentech koolzaad niet schadelijk is? Neemt u hier verantwoordelijkheid voor, ook in de toekomst? Zo ja, hoe ziet dat verantwoordelijkheid dragen er dan uit? We achten de bijgeleverde adviezen, giswerk, gedateerd en verre van compleet. Dit geeft ons een onbehagelijk gevoel, dat ten koste gaat van ons welbevingen .

De wetenschap staat niet stil en er moeten nieuwe onderzoeken zijn, die dan ook meegenomen moeten worden bij een beoordeling.

Waar zijn al die uitgebreide, onafhankelijke, valabele onderzoeken gepubliceerd in gerenommeerde wetenschappelijke tijdschriften naar bv de toxiciteit op de lange termijn voor mens, dier en bodem? Waar kunnen we die inzien?

Oostenrijk heeft gelijk als zij stelt, dat dit koolzaad niet op de markt mag komen. Er zijn b.v. onvoldoende en gebrekkige toxiciteits- en allergieproeven gedaan en in een te korte tijdsspanne. Verder is men beducht voor ongewilde uitkruising. (Dit is ook van toepassing op de Nederlandse situatie.) Hun conclusie is dan ook;

3. Conclusion

Both the toxicological and allergological risk assessments of GT73 oilseed rape are considered to be inadequate regarding the choice of methods. The data provided by the notifier do not give enough evidence that the use of GT73 oilseed rape is safe from a toxicological and allergological point of view.

Additionally, the monitoring plan does not take into consideration accidental spillage and its environmental consequences. Unprocessed oilseed rape is transported to Austria in considerable amounts, feral oilseed rape populations can be found along transport routes where Glyphosate is applied and oilseed rape seeds can establish and are likely to build up persistent populations.

Therefore it can be considered as highly likely that imported GT73 oilseed rape will spread and persist in certain habitats in Austria. Due to the fact that GT73 oilseed rape is herbicide tolerant the application of Glyphosate in these habitats would confer a selective advantage to feral GT73 oilseed rape plants. For a

complete risk assessment the knowledge of the frequency distribution of seed spills is therefore inevitable. Neither a monitoring plan nor an emergency plan was provided by the notifier in order to monitor the presence of GT73 oilseed rape in case of accidental spillage. Finally, co-existence issues of accidental seed spills of GT73 oilseed rape with conventional oilseed rape production are still unsolved. (Bundesministerium für Gesundheit und Frauen, Wenen, ingekomen bij de VROM 13-07-2006).

(3) In februari 2005 heeft het Japanse Instituut voor Milieustudies een rapport gepubliceerd waarin gewag wordt gemaakt van de accidentele aanwezigheid van door middel van genetische modificatie herbicidetolerant gemaakt koolzaad in de nabijheid van vijf van de zes haveninstallaties waar monsters waren genomen.

Uit; Aanbeveling van de Commissie (2005/637/EG)

U kunt dit feit toch niet negeren!

Wij lezen;

(45) Means should be sought for providing possibilities for facilitating the control of GMOs or their retrieval in the event of severe risk .

(DIRECTIVE 2001/18/EC of 12 March 2001).

http://europa.eu.int/eur-lex/pri/en/oj/dat/2001/l_106/l_10620010417en00010038.pdf Hoe gaat u dat uitvoeren? Eenmaal in het milieu losgelaten, kunnen GMO's nooit teruggehaald worden!

(47) The competent authority should give its consent only after it has been satisfied that the release will be safe for human health and the environment.

(DIRECTIVE 2001/18/EC of 12 March 2001).

http://europa.eu.int/eur-lex/pri/en/oj/dat/2001/l_106/l_10620010417en00010038.pdf Hoe kunt u weten of het wel of niet schadelijk is? Als u dat niet voor 100% weet, niet doen!

Lees ook; Actueel: Goedgekeurde genetisch gemanipuleerde gewassen blijken toch schadelijk. Ingelast en bijgevoegd (Bijlage 6).

<http://www.greenpeace.nl:80/news/goedgekeurde-genetisch-gemanip>

Lees ook het oorspronkelijke rapport

http://www.greenpeace.de/fileadmin/gpd/user_upload/themen/gentechnik/MON_863_French_report_statistics.pdf Ingelast en bijgevoegd. (bijlage 7).

Wij hebben geen behoefte aan deze gentech koolzaadsoort en vinden dat deze markttoelating niet mag doorgaan.

Vriendelijke groet,

Miep Bos en andere verontruste burgers, (biologische) boeren, Stichting Ekopark, Platform Belangen van Consument (BeVaCo, zie het aparte, bijgevoegde bezwaarschrift) en Stichting VoMiGen. (Zie bijgevoegde handtekeningenlijsten, er volgen er nog meer).

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CC Leden en plaatsvervangende leden van de Vaste Kamer Commissie LNV, Leden en plaatsvervangende leden van de Vaste Kamer Commissie VROM, PB 20018, 2500 EA Den Haag.

Bijlage 1. Allerlei over glyfosaat en Roundup. Glyfosaat, (Roundup bevat glyfosaat) en Roundup zelf zijn helemaal niet zo milieuvriendelijk en veilig, zie een aantal artikelen.

Bijlage 2. Grootste Russische importeur wil enkel GGO-vrije soja (RR soja is bestand gemaakt tegen Roundup).

Bijlage 3 Allerlei

Bijlage 4 <http://www.i-sis.org.uk/NTGMORGT73.php> Uitgeprint

Bijlage 5. http://www.i-sis.org.uk/pdf/GM_Food_Nightmare_Unfolding.pdf Uitgeprint

Bijlage 6 <http://www.greenpeace.nl/news/goedgekeurde-genetisch-gemanip> Uitgeprint

Bijlage 7

http://www.greenpeace.de/fileadmin/gpd/user_upload/themen/gentechnik/MON_863_French_report_statistics.pdf Uitgeprint

Bijlage 8 From Humans To Crops: Could Genetic Modification Be Killing The Bees?

<http://www.raidernetwork.com/full.php?news=3585> Uitgeprint

Bijlage 9 Handtekeningenlijsten, meer handtekeningen zullen nog volgen. Reeds naar Min. van VROM gestuurd.

Bijlage 10 Bezwaarschrift Platform Belangen van Consument (BeVaCo). Met separate post.

Bijlage A. Niet gemanipuleerd en wel succesvol.

Toestemming vermenigvuldigen artikelen van de I-SIS website, e-mail van Dr. Mae-Wan Ho van 16-03-2007 in ons bezit.

----- Bijlagen 1.
Allerlei over glyfosaat en Roundup.

Glyfosaat is niet zo onschuldig als wordt beweerd.

http://home.wanadoo.nl/natuurverrijking/publicaties/roundupfeiten_ned.htm

Acute giftigheid bij proefdieren De orale toediening van een LD-50 dosis (de dosis die de dood veroorzaakt bij 50 procent van de proefdieren) bij ratten is hoger dan 4320 mg/kg van het lichaamsgewicht. En dit brengt glyfosaat in de VS in giftigheidscategorie drie (Waarschuwing). 4 De acute dodelijke giftigheid via de huid (dermale LD-50) bij konijnen is meer dan 2000 mg/kg lichaamsgewicht. Daardoor belandt het bestrijdingsmiddel ook in giftigheidscategorie drie. 4 De commerciële glyfosaat-bevattende bestrijdingsmiddelen zijn acuut meer giftig dan de zuivere glyfosaat. De hoeveelheid Roundup (glyfosaat en de uitvloeier POEA) die nodig is om ratten te doden is ongeveer 1/3 van de benodigde hoeveelheid zuivere glyfosaat. 15 Roundup is dan ook acuut meer giftig dan POEA alleen. 15 Glyfosaat-bevattende producten zijn giftiger bij inademen dan bij inslikken. Het inademen van Roundup door ratten veroorzaakte vergiftigingsverschijnselen bij alle testgroepen, 16 zelfs bij de laagst geteste concentraties. De symptomen waren: moeizaam ademen, verstopte ogen, verminderde beweeglijkheid 17 en gewichtsverlies. 16 De longen waren rood gekleurd of vol met bloed. 17 De benodigde dosis om longschade en dood te veroorzaken bij toediening in de longen via rechtstreekse injectie in de luchtpijp van twee Roundup producten en POEA, bedroeg slechts 1/10 van de dosis die schade aanricht bij het inslikken van deze stoffen. 15,18 Effecten op de bloedsomloop: Honden kregen intraveneuze injecties toegediend van glyfosaat, POEA en Roundup om de concentraties te benaderen die men aantreft in het bloed van mensen die glyfosaat binnenkregen; glyfosaat verhoogde het samentrekken van de hartspier, POEA veroorzaakte een verminderde uitzetting van de hartspier en dus een lagere bloeddruk. Roundup veroorzaakte hartklachten. 19 Oogirritatie: NCAP maakte een overzicht van oogrisico's die opgesomd worden op lijsten van veiligheidsvoorschriften voor 25 glyfosaat-bevattende producten. Een van de producten is 'sterk irriterend', 20 vier ervan veroorzaken 'aanzienlijke maar tijdelijke oogschade', 21-24 acht veroorzaken oogirritatie, 25-32 vijf 'kunnen oogirritatie veroorzaken', 33-37 een ervan is 'matig irriterend' 38 en drie van de 25 zijn 'licht irriterend'. 39-41 De drie overige producten vereisen toevoeging van een uitvloeier voor gebruik, 42-44 en dit product dat eveneens verkocht wordt door de fabrikant van glyfosaat 'veroorzaakt brandende ogen'. 45 Huidirritatie: Glyfosaat staat te boek als licht irriterend voor de huid. Roundup is 'matig huidirriterend' en herstel kan meer dan twee weken duren. 16 Fragment uit

http://home.wanadoo.nl/natuurverrijking/publicaties/roundupfeiten_txt_ned.htm#_Toc478733309

Glyphosaat Gisterenochtend hielden wij ons panel in het Alternatieve Forum. Al vroeg brandden we weg onder het witte zeil, maar desondanks discussieerde het panel tweeneenhalf uur lang door. Petrona Villasboa deed verslag van de situatie waarin haar familie zich bevindt, omgeven door sojavelen. Haar elfjarige zoon Silvino overleed nadat hij twee keer was bespoten met glyphosaat en insecticiden door burenen die Roundup Ready soja produceren Haar ligt nu bij het hooggerechtshof, maar ondertussen wordt haar het leven heel moeilijk gemaakt. Sofia vertelde over de situatie in haar wijk, waar een absurd aantal gevallen van kanker en andere ziektes voorkomt, veroorzaakt door het spuiten op sojavelen aan drie kanten van de wijk. Een vrouw uit Colombia gaf me eerder het voorbeeld van glyphosaat gebruik op de katoenvelden daar. Ook daar is een hoog aantal kankergevallen, maar de overheid houdt vol dat niet valt aan te tonen dat het door de pesticiden veroorzaakt wordt.

http://www.noticias.nl/soja_artikel.php?id=1205

+ PARAGUAY In 2003 werd Silvino Talavera van 11 jaar besproeid met een cocktail van toxische stoffen dat gebruikt werd om "Roundup Ready" sojavelen te bespuiten. De familie Talavera Villasboa behoort tot de vele Paraguayanen die omringd zijn door grote

monoculturen van Monsanto's Roundup Ready gg-soja. De agressieve marketing hiervan en de enorme toename in het gebruik ervan heeft geleid tot veel meer spuiten met glyfosaat (het werkzame bestanddeel van Roundup) over het platteland van Paraguay en de bewoners daarvan. Silvino overleefde een tweede bespuiting niet. In zijn bloed en dat van zijn familieleden werden phenol, carbamatol en glysophaat gevonden. Sindsdien heeft de familie gestreden voor gerechtigheid. Er is enorme druk op ze uitgeoefend om de rechtszaak in te trekken, waaronder doodsb bedreigingen. <http://www.gmwatch.org/archive2.asp?arcid=7199>

+ MEER ROUNDUP READY ONKRUIDEN Door het verkopen van gewassen die door genetische manipulatie resistent zijn tegen Monsanto's onkruidbestrijdingsmiddel Roundup is de toepassing van dit herbicide enorm toegenomen. Dit heeft geleid tot een explosie aan onkruiden op het Amerikaanse boerenland die op hun beurt resistentie ontwikkeld hebben tegen dit glyfosaat, het werkzame bestanddeel in Roundup. Volgens landbouwdeskundigen kan dit een enorme impact hebben op de toekomst van het landbouwsysteem in de VS. Er zijn nog geen bestrijdingsmiddelen in ontwikkeling die de resistente onkruiden kunnen helpen beheersen. <http://www.gmwatch.org/archive2.asp?arcid=7190>
<http://www.gmwatch.org/archive2.asp?arcid=7132>

De licentie van Roundup is in 2000 verlopen, toch moeten US boeren nog steeds dit herbicide gebruiken in combinatie met GGO's van die firma. Daarom is de American Corn Growers Association (ACGA) dit jaar een rechtszaak tegen de fabrikant begonnen, vanwege oneerlijke concurrentie.

Zie <http://www.acga.org/News/2007/Monsantocomplaintasfiled.pdf>

2

Grootste Russische importeur wil enkel GGO-vrije soja 23/11/2006 print

De grootste Russische importeur van soja, Sodruzhestvo, heeft beslist om in zijn nieuwe vestiging in Kaliningrad enkel GGO-vrije soja te verwerken. Deze beslissing sluit aan bij de wens van 80 procent van de Russische consumenten die tegen het gebruik van GGO's in hun voeding zijn. In de praktijk betekent dit een verschuiving van de import van GGO-soja uit Argentinië en de VS naar de invoer van GGO-vrije soja uit Brazilië. Dat meldt Greenpeace in een persbericht.

Andere Russische ondernemingen zouden volgens de milieuorganisatie het voorbeeld van Sodruzhestvo willen volgen. Deze beslissing heeft vooral grote implicaties voor de VS en Argentinië. "In de toekomst zullen we vooral soja importeren uit Brazilië. Volgens ons is dat het enige land waar GGO-vrije soja groeit die aan onze kwaliteitseisen voldoet", aldus de topman van Sodruzhestvo.

Greenpeace vraagt wel dat de Russische invoerder het tweejarig moratorium respecteert op soja uit ontboste gebieden in het Amazonewoud waartoe de Braziliaanse soja-industrie onlangs besliste. Verder vraagt de milieuorganisatie ook de Belgische invoerders en gebruikers van soja, die zich recent verenigden in een 'platform voor duurzaamheid', om zich te laten inspireren door het Russische voorbeeld.

<http://www.vilt.be/nieuwsarchief/detail.phtml?id=11882>

3. Allerlei

Zie ook <http://www.i-sis.org.uk/Making-the-World-GM-Free-and-Sustainable.php> (met daarin ondermeer onderzoek naar muizen in de voormalige Sovjet Unie toont aan dat GGO-soja schadelijk blijkt te zijn voor het nageslacht.)

+ SPAANSE BIOLOGISCHE BOEREN IN DE PROBLEMEN DOOR GM BESMETTING
Biologische boeren in Spanje verbouwen geen mais meer nadat er sporen van GM in gevonden zijn. In 2004 werd er in Aragon (Spanje) nog biologisch mais verbouwd op 120 hectare grond. Al deze mais bleek besmet te zijn door GMO's. In 2005 werd er in Aragon dan ook slechts op 37 hectare biologische mais verbouwd.
<http://www.gmwatch.org/archive2.asp?arcid=7207>

+ GENEWATCH OVER BESMETTINGEN Volgens dr. Sue Mayer van Genewatch, dat een lijst bijhoudt van alle wereldwijde gg-besmettingen, zijn er nu 132 incidenten bekend. "Te zien is dat de gg-gewassen op elk ontwikkelingsstadium buiten de controle kunnen vallen, uit het laboratorium, van het veld, op het bord. Het is duidelijk dat de maatregelen om dit te voorkomen makkelijk falen en dat steeds vaker menselijke fouten optreden: mensen zijn niet in staat om de voorzorgsmaatregelen te nemen die de wet of de markt van ze vraagt, of ze willen het niet." <http://www.gmwatch.org/archive2.asp?arcid=7088>

4 maart 2007 The Independent . Sick people used like laboratory rats in GM trials Patienten gebruikt als laboratoriumratten bij gentechaardappel proeven van Monsanto.

<http://news.independent.co.uk/environment/article2326209.ece>

Show #535: A SPRING OF DYING BEES - 24-03-2007 (8.73 MB) Listen Now Guests: Professors Eric Mussen from the University of California , Davis , and Jim Amrine from West Virginia University Subject: We know what happens with the birds and the bees. But it is the Spring of dying bees, and this leads us to ask, "What happens when there are no bees?" Topics include why bees are dying in such big numbers this Spring; what might happen to the food chain should we lose our bees; and what solutions might there be to halt the die-off.

Show #534: Human Rice - 10-03-2007 (8.84 MB) Listen Now Guests: Karen Stillerman, Union of Concerned Scientists and tentative from Ventria Bioscience Subject: The Department of Agriculture has approved the large-scale planting of rice containing human genes. This leads one to ask: "Can those human genes be kept down on the farm?" Topics include why some want to infuse rice with human genes; why some oppose the planting of this rice; and whether the potential benefits of this rice outweigh its potential risks.

http://www.metrofarm.com/mf_Food_Chain_Radio.php

20 maart 2007 Biotech industry withdraws GM foods .

Brussels, March 20th, 2007 - The European Union is today discussing the official withdrawal by the biotech industry of five genetically modified (GM) foods and crops, including the first GM crop that was ever grown in Europe. [1] Friends of the Earth Europe has highlighted this as further proof that GM crops are failing. [2]

4] The products being withdrawn are:

Genetically modified maize, Bt176 produced by Syngenta Genetically modified oilseed rape, Ms1xRf1, produced by Bayer Genetically modified oilseed rape, Ms1xRf2, produced by Bayer Generically modified oilseed rape, Topas 19/2, produced by Bayer Genetically modified maize, GA21xMON810, produced by Monsanto

http://www.foeeurope.org/press/2007/March20_HH_withdrawal_GM_crops.htm#1

12 maart 2007 GM crops fail EU Lisbon Agenda goals

New research says green farming more competitive

Brussels , March 12th 2007 - Environmentally-friendly farming will create more jobs and make the EU more competitive than if it grows genetically modified (GM) crops, shows new research published today by Friends of the Earth Europe. The research coincides with the expected withdrawal later today of a European Parliament Resolution that promotes GM crops. MEPs are requesting that the text be rewritten because it attacks the precautionary principle and ignores research showing that GM food and farming has not lived up to expectations [1] .

Helen Holder, European GMO campaigner at Friends of the Earth Europe, said "The genetic modification approach to farming is failing despite the hype, public funding and political will. Greener farming stimulates the economy, benefits the environment and the public loves it."

http://www.foeeurope.org/press/2007/March12_HH_biotech_mtr_report.htm

Bijlage A

----- NIET GEMANIPULEERD EN WEL
SUCCESVOL -----

Tijdens het debat "De keerzijde van gentechnologie" 20 oktober 2001 in Diligentia, Den Haag.

Afrikaanse oplossing: push-pull

In Kenia ontwikkelde de Indiase wetenschapper dr. Zeyaur Khan een alternatief voor de Bt-maïs van Novartis. Jaarlijks gaat ongeveer de helft van de maïs oogst in Kenia ten onder aan een gezamenlijke invasie van het " heksenkruid" (Striga) en stengelboorders. Deze schadelijke insecten zijn familie van de maïsboorders, waartegen Novartis zijn genetisch gemanipuleerde Bt-maïs ontwikkelde. Het biotech-bedrijf is al begonnen met een programma om Bt-maïs in Kenia te testen en te introduceren. Khan's "push-pull" methode bestrijdt onkruid én insect, zonder gebruik van chemische bestrijdingsmiddelen en zonder genetische manipulatie.

Wat het onkruid en de stengelboorders kunnen aanrichten in de maïs veldjes van kleine Keniase boeren, laat Khan zien op dia's en een video. Ontmoedigende beelden van maïsplanten met bladeren vol gaten, die slap omlaag hangen. Vaak zijn ze omringd door verraderlijk mooie bloemen: het heksenkruid, dat parasiteert op de wortels van de maïsplant. De zaden van het onkruid blijven in de grond nog zo'n tien jaar lang werkzaam.

Khan en zijn team testten meer dan vierhonderd soorten gras en vonden uiteindelijk Napier, een soort die zeer aantrekkelijk bleek te zijn voor stengelboorders. Een haag van deze grassoort, geplant rondom een maïs veld, lokt de insecten weg van de maïs. Om de maïsplanten onaantrekkelijk te maken voor de stengelboorders, zaaiden ze er desmodium tussen. Dat stoot de insecten af en bestrijdt ook nog het heksenkruid. Bovendien bemest het de grond met natuurlijke voedingsstoffen. Dat is de "push-pull" methode: het desmodium duwt de stengelboorder uit het maïs veld en het Napier gras trekt het schadelijke insect aan.

http://www.talk2000.nl/docu/bmd_101_verslag-conferentie.html

+ BIOLOGISCHE LANDBOUW BIEDT HOOP VOOR INDIASE KATOENBOEREN
Terwijl veel boeren in Andhra Pradesh (India) uit wanhoop zelfmoord plegen wegens de schulden door mislukkende gg-katoen, is er een dorp waar de boeren geen schulden hebben, en dus geen zelfmoord plegen of wegtrekken. De boeren hebben laten zien dat ze zonder pesticiden, kunstmest en gg-gewassen een hoopvolle toekomst in de landbouw hebben. Het is het eerste dorp in het land dat zich gm-vrij en chemicaliën-vrij heeft verklaard.

<http://www.gmwatch.org/archive2.asp?arcid=7142>

+ IS DE GG-KATOEN-HYPE TEN EINDE? Katoenboeren in het hele land volgen het voorbeeld van Andhra Pradesh en stoppen met pesticiden en Bt-katoenzaden. En er zijn geen plagen. Hoe kan dat? Er zijn 28 natuurlijke bestrijders van de Amerikaanse bollworm, de voornaamste vijand van katoen. Als je geen pesticiden meer spuit, krijgen deze nuttige insecten de kans om de bollworm onder controle te houden.

<http://www.gmwatch.org/archive2.asp?arcid=7103>

+ 'ZAADBEDRIJVEN SPECIALISEREN IN GG-VRIJ ZAAD' - WALL ST JOURNAL De Wall Street Journal schrijft over de tweede biotechnologische Groene Revolutie over zaadbedrijven die zich toeleggen op gentechvrije zaden, die ze veredelen door marker assisted breeding (zie woordenlijst onderaan). Men heeft onderzoeksdirecteur George Kotch van Syngenta AG's Noord Amerikaanse groentezadenafdeling horen zeggen "Het publiek reageert nogal lauw tjes [!!] op GG producten. Marker Assisted Breeding is een technologie zonder een imagoprobleem." <http://www.gmwatch.org/archive2.asp?arcid=7209>

Meerdere berichten van www.gentech.nl

Begeleidende brieven bij de handtekeningen en aanvulling op het bezwaar (brief 1). Lelystad, 2 april 2007.

Ministerie van VROM

p/a Bureau GGO

Postbus 1

3720 BA Bilthoven

Geachte mevrouw Cremers,

Hierbij sturen we u nog een aantal handtekeningen tegen de markttoelating van GT 73 koolzaad en voor een Gentechvrij Nederland op. Wij hebben al 274 handtekeningen aan u opgestuurd. Het totaal is op dit moment 417 handtekeningen.

Mochten er nog meer handtekeningen binnenkomen, dat sturen wij die eveneens op.

Vriendelijke groet,

Miep Bos, Wieteke van Dort en andere verontruste burgers, in het bezwaarschrift genoemde stichtingen en (biologische) boeren.

miep@gentechvrij.nl

www.gentechvrij.nl

www.wietekevandort.nl

Lelystad, 3 april 2007.

Begeleidende brief 2.

Ministerie van VROM

p/a Bureau GGO

Postbus 1

3720 BA Bilthoven

Geachte mevrouw Cremers,

Hierbij sturen we u nog een aantal handtekeningen tegen de markttoelating van GT 73 koolzaad en voor een Gentechnvrij Nederland op. Wij hebben al 417 handtekeningen aan u opgestuurd. Het totaal is op dit moment 477 handtekeningen.

Mochten er nog meer handtekeningen binnenkomen, dat sturen wij die eveneens op.

Als aanvulling op het bezwaarschrift het volgende;

De bezwaarmakers vragen zich het volgende af; "Hoe komt het dat deze lente 80 - 90% van de bijenpopulaties in de USA gestorven zijn? De naam die men hieraan heeft gegeven is Collony Colapse Disorder (CCD). USA bijendeskundige Professor dr. Eric Mussen van de Universiteit van California wijt dit in ieder geval aan malnutricion . Bijen zijn voor hun voeding afhankelijk van gezonde pollen, waar ze ook hun chloolesterol uit halen. (Zie bezwaarschrift <http://www.gentechnvrij.nl/bezwaarkoolzaadgt73.html> en klik op de link naar de radio-uitzending). Bijen zijn onmisbaar voor zeker 100 gewassen. Dr. Albert Einstein zei het al: "Zonder bijen hebben de mensen nog 4 jaar te leven. "

Vriendelijke groet,

Miep Bos, Wieteke van Dort en andere verontruste burgers, in het bezwaarschrift genoemde stichtingen en (biologische) boeren.

miep@gentechnvrij.nl

www.gentechnvrij.nl

www.wietekevandort.nl

Lelystad, 4 april 2007.

Begeleidende brief 3.

Ministerie van VROM

p/a Bureau GGO

Postbus 1

3720 BA Bilthoven

Geachte mevrouw Cremers,

Hierbij sturen we u nog een aantal handtekeningen tegen de markttoelating van GT 73 koolzaad en voor een Gentechnvrij Nederland op. Wij hebben al 477 handtekeningen aan u opgestuurd. Het totaal is op dit moment 500 handtekeningen.

Mochten er nog meer handtekeningen binnenkomen, dat sturen wij die eveneens op.

Vriendelijke groet,

Miep Bos, Wieteke van Dort en andere verontruste burgers, in het bezwaarschrift genoemde stichtingen en (biologische) boeren.

miep@gentechnvrij.nl

www.gentechnvrij.nl

www.wietekevandort.nl

Lelystad, 5 april 2007.

Begeleidende brief 4.

Ministerie van VROM

p/a Bureau GGO

Postbus 1

3720 BA Bilthoven

Geachte mevrouw Cramer,

Allereerst mijn excuses voor het verkeerd spellen van uw naam de vorige 3 begeleidende brieven.

Hierbij sturen we u nog een aantal handtekeningen tegen de markttoelating van GT 73 koolzaad en voor een Gentechnvrij Nederland op. Wij hebben al 500 handtekeningen aan u opgestuurd. Het totaal is op dit moment 528 handtekeningen. Elke dag komen er nog handtekeningen binnen.

Vriendelijke groet,

Miep Bos, Wieteke van Dort en andere verontruste burgers, in het bezwaarschrift genoemde stichtingen en (biologische) boeren.

miep@gentechnvrij.nl

www.gentechnvrij.nl

www.wietekevandort.nl

Deze brief is wegens tijdsgebrek ook verstuurd via e-mail.

Lelystad, 6 april 2007.

Begeleidende brief 5.

Ministerie van VROM

p/a Bureau GGO

Postbus 1

3720 BA Bilthoven

Geachte mevrouw Cramer,

Hierbij sturen we u nog een aantal handtekeningen tegen de markttoelating van GT 73 koolzaad en voor een Gentechvrij Nederland op. Wij hebben al 528 handtekeningen aan u opgestuurd. Het totaal is op dit moment 550 handtekeningen (Platform Belangen Van Consumenten) had ik nog niet meegeteld). Elke dag komen er nog handtekeningen binnen.

Vriendelijke groet,

Miep Bos, Wieteke van Dort en andere verontruste burgers, in het bezwaarschrift genoemde stichtingen en (biologische) boeren.

miep@gentechvrij.nl

www.gentechvrij.nl

www.wietekevandort.nl

Deze brief is wegens tijdsgebrek ook verstuurd via e-mail.

Hierna zijn er nog 15 handtekeningen naar ons gestuurd en komt het totaal nu (13 april 2007) op 565.

Translation

On 27 March 2007 I wrote the following:

NOTICE OF OBJECTION

Lelystad, 27 March 2007.

Minister J. M. Cramer

p/a Bureau GGO

Postbus 1

3720 BA Bilthoven

Dear Ms Cramer,

Subject: Reservations about and notice of objection to a marketing authorisation for:
Roundup Ready (glyphosate-tolerant) oilseed rape, event GT73.
Decision reference DGM/SAS/ C/NL/98/11.
Monsanto

The genetically modified organisms which are to be marketed as a product or in a product for the purposes of importation, processing and use as animal feed (not crops) are grains of oilseed rape (*Brassica napus L.*) tolerant to the herbicide glyphosate, derived from the *B. napus* line GT73 which is transformed by the vector PV-BNGT04 with the aid of *Agrobacterium tumefaciens*.

(Text from the announcement of the Decision published in the *Volkskrant* of 28.2.2007).

We do not want GM oilseed rape or any other GM plant, or seeds or derivations thereof to be imported, put on the market, cultivated (planted) or traded in the Netherlands. The Netherlands must remain GM-free so that the environment is spared undesirable combinations or outcrossings of organic - traditional - and GM seed and pollen, and derivations thereof or other unforeseen events, so that organic and traditional agriculture can be sustained and we and livestock are not exposed to the unforeseen consequences attendant on planting, trading and consuming (health!) these GM crops now and in the future. We, the Stichting Ekopark, Stichting VoMiGEN, Platform Belangen van Consument (BeVaCo) and farmers, are interested parties in this matter (see page 2 for interpretation).

25. Information on the safety of the GMHP to animal health, where the GMHP is intended to be used in animal feedstuffs, if different from that of the recipient/parental organism(s)

There is no difference between GT73 and the recipient organism in terms of safety to animals (See question 24). From: SNIF – Placing on the market Roundup Ready oilseed rape derived from line GT73 Blz. 15

<http://gmoinfo.jrc.it/csnifs/C-NL-98-11.pdf>

We disagree. This oilseed rape is to be used as animal feed. This must be prevented at all costs because, after it has been cold-pressed, residues of herbicides still remain in the feed (the genetically modified products are not broken down either) and can enter the human food chain by being fed to animals.

This oilseed rape is therefore not equivalent to “conventional oilseed rape” at all.

At a symposium in New Orleans it was announced that labelled substances had been used to show that more than 90% of the herbicide applied was transformed back into the original herbicide in the digestive tract of animals. (New Orleans 25 March 1996)

We do not think this is healthy for animals and we do not want any genetically modified products and herbicides on our plates.

Consumers, Platform Belangen van Consument (BeVaCo, see the attached notice of objection) and Stichting VoMiGEN, which also represents consumers, are interested parties.

Signatories also have religious and/or ethical reservations: several signatories believe it is not ethical to cut and paste DNA, the blueprint for life which God created. Has that been taken into consideration?

(9) Respect for ethical principles recognised in a Member State is particularly important. Member States may take into consideration ethical aspects when GMOs are deliberately released or placed on the market as or in products. (DIRECTIVE 2001/18/EC of 12 March 2001).

http://europa.eu.int/eur-lex/pri/en/oj/dat/2001/l_106/l_10620010417en00010038.pdf

The fine rape seeds can, as Monsanto itself points out, be released into the environment during transport. Oilseed rape is not an indigenous plant here. This may result in undesirable genetically modified oilseed rape plants and outcrossings with feral variants which can become “super weeds” because they are resistant to, for example, Roundup. This is a threat to the environment because more and stronger herbicides have to be used against these super weeds. They also constitute a hazard for organic and conventional agriculture. Stichting EKOpark and (organic) farmers are thus also interested parties.

Therefore an unintended release would be more likely to occur during import, processing and transportation of GT73 grain. From; SNIF – Placing on the market Roundup Ready oilseed rape derived from line GT73 Blz.5

<http://gmoinfo.jrc.it/csnifs/C-NL-98-11.pdf>. We draw attention to the following:

(6) Under the Treaty, action by the Community relating to the environment should be based on the principle that preventive action should be taken.

And

(7) It is necessary to approximate the laws of the Member States concerning the deliberate release into the environment of GMOs and to ensure the safe development of industrial products utilising GMOs.

And

(8) The precautionary principle has been taken into account in the drafting of this Directive and must be taken into account when implementing it.

(DIRECTIVE 2001/18/EC of 12 March 2001).

http://europa.eu.int/eur-lex/pri/en/oj/dat/2001/l_106/l_10620010417en00010038.pdf

The use of GT73 for oilseed rape production would enable the farmer to utilize Roundup herbicide for effective control of weed pests and to take advantage of this herbicide's environmental and safety characteristics.

From; SNIF – Placing on the market Roundup Ready oilseed rape derived from line GT73 Blz. 12

<http://gmoinfo.jrc.it/csnifs/C-NL-98-11.pdf> Roundup and glyphosate are not very environmentally friendly or safe at all, see Annex 1.

Oilseed rape is a relatively environmentally friendly plant and requires few herbicides (*Dagblad De Stentor, Spectrum* 17.3.2007).

What changes are there in a Roundup Ready crop?

In such a crop, Roundup Ready soya, changes have been found in the concentration of substances which are attributable to this enzyme. This is particularly true when a plant is sprayed with glyphosate. In the authorisation procedure, the fact that the plant takes on a different composition as a result of the spraying is not taken into consideration: only measurements taken on unsprayed plants have been published. Some people (among others Professor Benbrook) assume that this is done deliberately in order to create the impression that the manipulated soya is “substantially equivalent” to normal soya.

From:

http://www.platformgentechnologie.nl/genetech/maatschappelijk_debat/De%20complexiteit%20van%20genen.doc

Survivability

Laboratory and field studies have been conducted to determine whether the survival and/or over-wintering characteristics of GT73 had been improved, which could increase the potential of GT73 to become a weed.

Based on results obtained in various agricultural environments, it is concluded that there is no difference in survivability between GT73 and conventional oilseed rape.

From: SNIF - Placing on the market Roundup Ready oilseed rape derived from line GT73 Blz. 14, <http://gmoinfo.jrc.it/csnifs/C-NL-98-11.pdf>.

The winters in the Netherlands and Europe are getting warmer and it is more than probable that plants will survive.

No to GM Oilseed Rape GT73 Monsanto has applied to import its GM oilseed rape GT73 into Europe for use in animal feed and processing. The Scientific Panel on GMOs of the European Food Safety Authority has given it a favourable opinion, and there will soon be a vote on it at the Council of Ministers. Here's a description of what it is and why it should be rejected . Prof. Joe Cummins , Dr. Mae-Wan Ho and Lim Li Ching

See also: <http://www.i-sis.org.uk/NTGMORGT73.php> Annex 4

The above link is to comments by ISIS.org on GT73. Please read them in their entirety and regard them as an integral part of this document. This web page has been printed out and is attached.

Fragment; An application for the import and use of GT73, excluding cultivation, was submitted in 1998 to the competent authority of the Netherlands. It gave this application a favourable opinion, and in January 2003 recommended that GT73 be approved. Several member States raised questions, including the UK, via its Advisory Committee on Releases to the Environment (ACRE) [4]. One of the concerns related to increased liver weights in rats fed GT73, compared with controls (see later).

Please read the I-SIS Report below too and regard it as an integral part of this document. It is also printed out and attached. Annex 5

GM Food Nightmare Unfolding in the Regulatory Sham

Mae-Wan Ho¹, Joe Cummins^{1,2} and Peter Saunders^{1,3}

¹Institute of Science in Society, PO Box 51885, London NW2 9DH, UK, www.i-sis.org.uk

²Department of Biology, University of Western Ontario, Canada

³Department of Mathematics, King's College, London WC2R 2LC, UK

Abstract

Our regulators are ignoring the precautionary principle, manipulating and corrupting science, sidestepping the law, and helping to promote GMOs in the face of massive public opposition and damning evidence piling up against the safety of GM food and feed

http://www.i-sis.org.uk/pdf/GM_Food_Nightmare_Unfolding.pdf

•Monsanto's Roundup Ready soya, commercially grown for years, was the only crop to be independently checked by molecular methods last year. Not only is the gene order of the insert found to be scrambled, the plant genome at the site of insertion is also scrambled, and there is a 534 bp fragment of unknown origin in there as well [27]. All very different from the original data provided by Monsanto. <http://www.i-sis.org.uk/Scotland2.php> Can you prove that the Roundup Ready genetically modified oilseed rape is not harmful? Do you assume responsibility for it, in the future as well? If so, how will liability be assumed? We regard the information provided to be out-of-date guesswork which is far from complete and gives us the uncomfortable feeling that it comes at the expense of our well-being.

Science does not stand still and there must be new studies which should also be taken into consideration.

Where are all the extensive, independent, reliable studies published in reputable scientific journals on, for example, the long-term toxicity for humans, animals and soil? Where can we consult these?

Austria is right when it suggests that this oilseed rape should not be allowed on the market. Unsatisfactory and flawed toxicity and allergy tests have, for example, been carried out over too short a period. There are also fears of feral outcrossings. (This also applies to the Netherlands.) The conclusion is as follows:

3. Conclusion

Both the toxicological and allergological risk assessments of GT73 oilseed rape are considered to be inadequate regarding the choice of methods. The data provided by the notifier do not give enough evidence that the use of GT73 oilseed rape is safe from a toxicological and allergological point of view.

Additionally, the monitoring plan does not take into consideration accidental spillage and its environmental consequences. Unprocessed oilseed rape is transported to Austria in considerable amounts, feral oilseed rape populations can be found along transport routes where Glyphosate is applied and oilseed rape seeds can establish and are likely to build up persistent populations.

Therefore it can be considered as highly likely that imported GT73 oilseed rape will spread and persist in certain habitats in Austria. Due to the fact that GT73 oilseed rape is herbicide tolerant the application of Glyphosate in these habitats would confer a selective advantage to feral GT73 oilseed rape plants. For a complete risk assessment the knowledge of the frequency distribution of seed spills is therefore inevitable. Neither a monitoring plan nor an emergency plan was provided by the notifier in order to monitor the presence of GT73 oilseed rape in case of accidental spillage. Finally, co-existence issues of accidental seed spills of GT73 oilseed rape with conventional oilseed rape production are still unsolved. (Bundesministerium für Gesundheit und Frauen, Vienna, received at the Ministry of Housing, Planning and the Environment on 13.07.2006).

(3) In February 2005 the Japanese Institute for Environmental Studies published a report referring to the accidental presence of oilseed rape genetically modified for herbicide tolerance in the vicinity of five of the six port facilities where samples had been taken.

From: Commission Recommendation 2005/637/EC

You cannot deny this fact!

We see that:

(45) Means should be sought for providing possibilities for facilitating the control of GMOs or their retrieval in the event of severe risk.

(Directive 2001/18/EC of 12 March 2001).

http://europa.eu.int/eur-lex/pri/en/oj/dat/2001/l_106/l_10620010417en00010038.pdf. How are you going to do this? Once they have been released into the environment, GMOs can no longer be recovered!

(47) The competent authority should give its consent only after it has been satisfied that the release will be safe for human health and the environment.

(Directive 2001/18/EC of 12 March 2001).

http://europa.eu.int/eur-lex/pri/en/oj/dat/2001/l_106/l_10620010417en00010038.pdf. How do you know whether it is harmful or not? If you are not 100% sure, do not do it!

Please read also: latest news: approved genetically modified crops appear to be harmful. Incorporated and attached (Annex 6). <http://www.greenpeace.nl:80/news/goedgekeurde-genetisch-gemanip>

Please read the original report too

http://www.greenpeace.de/fileadmin/gpd/user_upload/themen/gentechnik/MON_863_French_report_statistics.pdf. Incorporated and attached (Annex 7).

We do not need this type of genetically modified oilseed rape and believe that this authorisation should not be granted.

Yours faithfully,

Miep Bos and other concerned citizens, (organic) farmers, Stichting Ekopark, Platform Belangen van Consument (BeVaCo, see the separate notice of objection attached) and Stichting VoMiGen. (See attached list of signatures with more to follow).

Donastraat 170

8226 LC Lelystad

0320 258421

miep@gentechvrij.nl www.gentechvrij.nl

CC: Members and deputy members of the Vaste Kamer Commissie LNV, members and deputy members of the Vaste Kamer Commissie VROM, PB 20018, 2500 EA The Hague.

Annex 1. Miscellaneous information about glyphosate and Roundup. Glyphosate, (Roundup contains glyphosates) and Roundup are not that environmentally friendly and safe at all (see several articles).

Annex 2. The largest Russian importer only wants GMO-free soya (RR soya is resistant to Roundup).

Annex 3. Miscellaneous

Annex 4. <http://www.i-sis.org.uk/NTGMORGT73.php> Printout

Annex 5. http://www.i-sis.org.uk/pdf/GM_Food_Nightmare_Unfolding.pdf Printout

Annex 6. <http://www.greenpeace.nl/news/goedgekeurde-genetisch-gemanip> Printout

Annex 7.

http://www.greenpeace.de/fileadmin/gpd/user_upload/themen/gentechnik/MON_863_French_report_statistics.pdf Printout

Annex 8. From Humans To Crops: Could Genetic Modification Be Killing The Bees?

<http://www.raidersnewsnetwork.com/full.php?news=3585> Printout

Annex 9. List of signatures with more to follow. This has already been sent to the Minister for Housing, Planning and the Environment.

Annex 10. Notice of objection from the Platform Belangen van Consument (BeVaCo). Under separate cover.

Annex A. Successful without being manipulated.

Agreement to reproducing articles from the I-SIS website, e-mail from Dr Mae-Wan Ho of 16.3.2007 in our possession.

Annex 1. Information on glyphosate and Roundup.

Glyphosate is not as innocuous as it was said to be.

http://home.wanadoo.nl/natuurverrijking/publicaties/roundupfeiten_ned.htm

Acute toxicity in test animals. Oral administration of an LD-50 dose (the dose that causes death in 50% of test animals) in rats is higher than 4320 mg/kg body weight, which puts glyphosate in toxicity class three (caution) in the US. The acute lethal toxicity via the skin (dermal LD-50) in rabbits is over 2000 mg/kg body weight. This also puts this pesticide in toxicity class three. The commercial pesticides which contain glyphosate are more acutely toxic than pure glyphosate. The quantity of Roundup (with glyphosate in the POEA wetter/spreader) required to kill rats is around one third of the amount of pure glyphosate required. Roundup is therefore more acutely toxic than POEA on its own. Products containing glyphosate are more toxic when inhaled than swallowed. Inhaling Roundup caused symptoms of poisoning in all test groups of rats even in the lowest tested concentrations. The symptoms were difficulties in breathing, congested eyes, reduced activity and loss of weight. The lungs were red or blood-congested. The dose required to cause damage to the lungs and mortality following pulmonary administration of two Roundup products and POEA by direct injection into the trachea was only one tenth of the dose causing damage when swallowed.

Effects on the Circulatory System: When dogs were given intravenous injections of glyphosate, POEA, or Roundup so that blood concentrations were approximately those found in humans who ingested glyphosate, glyphosate increased the ability of the heart muscle to contract. POEA reduced the output of the heart and the pressure in the arteries. Roundup caused cardiac depression.

Eye Irritation: NCAP surveyed eye hazards listed on material safety data sheets for 25 products containing glyphosate. One of the products is "severely irritating," four cause "substantial but temporary eye injury," eight "cause eye irritation," five "may cause eye irritation," one is "moderately irritating," and three are "slightly irritating." The other three products require addition of a surfactant (wetting agent) before use, and the surfactant sold by glyphosate's manufacturer for this purpose "causes eye burns."

Skin Irritation: Glyphosate is classified as a slightly irritating to skin. Roundup is a "moderate skin irritant" and recovery can take over two weeks.

Fragment from:

http://home.wanadoo.nl/natuurverrijking/publicaties/roundupfeiten_txt_ned.htm#_Toc478733309

Glyphosate: Yesterday evening we held a panel in the Alternative Forum. We were soon burning up under the white sailcloth roof but in spite of this the discussion lasted for two and a half hours. Petrona Villasboa reported on the situation of her family, who are surrounded by soya fields. Her 11-year-old son Silvino died after being sprayed twice with glyphosate and insecticide by farmers producing Roundup Ready soya. Her case is now before the Supreme

Court but in the meantime her life has been made very difficult. Sofia reported on the situation in her district where an excessive number of cases of cancer and other diseases occur caused by spraying the soya fields on three sides of the district. A woman from Colombia told me about glyphosate used on cotton fields. There too there is a high incidence of cancer but the government maintains that that does not prove that it is caused by the pesticide.

http://www.noticias.nl/soja_artikel.php?id=1205

+ PARAGUAY. In 2003 Silvino Talavera, 11 years old, was sprayed with a cocktail of toxic substances used to spray Roundup Ready soya fields. The family Talavera Villasboa is one of many Paraguayan families surrounded by large monocultures of Monsanto's Roundup Ready genetically modified soya. The aggressive marketing and the enormous increase in its use have led to glyphosate (the active ingredient of Roundup) being sprayed much more over the plains of Paraguay and their inhabitants. A second spraying proved fatal for Silvino. Phenol, carbatamol and glyphosate were found in his blood and in the blood of the members of his family. The family has been seeking justice before the courts, and enormous pressure has been brought to bear on them to drop the case, including death threats. <http://www.gmwatch.org/archive2.asp?arcid=7199>

+ MORE ROUNDUP READY WEEDS. As a result of sales of crops genetically modified for resistance to Monsanto's herbicide Roundup, its use has increased enormously. This has led to an explosion of weeds on American farm land which in turn have become resistant to glyphosate, the active ingredient in Roundup. Agricultural experts say that this could have an enormous impact on the future of the agricultural system in the US. There are no pesticides currently being developed which can help to control the resistant weeds.

<http://www.gmwatch.org/archive2.asp?arcid=7190>

<http://www.gmwatch.org/archive2.asp?arcid=7132>

The licence for Roundup expired in 2000 but US farmers must still use this herbicide in combination with the company's GMOs. The American Corn Growers Association (ACGA) initiated an action against the manufacturer on the grounds of unfair competition this year.

See <http://www.acga.org/News/2007/Monsantocomplaintasfiled.pdf>

2

The largest Russian importer only wants to import GMO-free soya 23/11/2006

The largest Russian importer of soya, Sodruzhestvo, has decided to process only GM-free soya in its new establishment in Kaliningrad. This decision is in keeping with the wishes of 80% of Russian consumers, who are against the use of GMOs in their food. In practice this means that imports of GMO soya from Argentina and the US will be replaced by GMO-free soya from Brazil, as Greenpeace reported in a press release.

According to the environmental organisation, other Russian companies wish to follow Sodruzhestvo's example. This decision has considerable implications for the US and Argentina. "In future we will mainly import soya from Brazil. We believe that it is the only country where GMO-free soya grows which meets our quality requirements" said the head of Sodruzhestvo.

Greenpeace calls upon the Russian importer to comply with the two-year moratorium on soya from deforested areas in the Amazon forest which the Brazilian soya industry recently

decided upon. Greenpeace also calls upon Belgian importers and users of soya who recently formed a “platform for sustainability” to follow the example set by the Russians.

<http://www.vilt.be/nieuwsarchief/detail.phtml?id=11882>

3. Miscellaneous

See also <http://www.i-sis.org.uk/Making-the-World-GM-Free-and-Sustainable.php> (with, *inter alia*, tests on mice in the former Soviet Union showing that GMO soya appears to be harmful for their progeny).

+ SPANISH ORGANIC FARMERS ARE HAVING PROBLEMS WITH GM CONTAMINATION. Organic farmers in Spain no longer cultivate maize after traces of GM were found. In 2004 organic maize was still being cultivated on 120 hectares of ground in Aragon (Spain). All this maize appeared to be contaminated by GMOs and in 2005 organic maize was cultivated on only 37 hectares in Aragon. <http://www.gmwatch.org/archive2.asp?arcid=7207>

+ GENEWATCH REPORTS ON CONTAMINATION. According to Dr Sue Mayer of Genewatch, which holds a list of all worldwide GMO contamination, 132 incidents have now come to their notice. “It is clear that GMO crops can go out of control at any stage of their development from the laboratory to the field and to the plate. It is clear that the measures to preclude this are prone to failure and that human error is occurring more and more frequently. Humans do not appear able or willing to take the precautionary measures required by the law or the market”. <http://www.gmwatch.org/archive2.asp?arcid=7088>

4 March 2007 The Independent. Sick people used like laboratory rats in GM trials.

<http://news.independent.co.uk/environment/article2326209.ece>

Show #535: A SPRING OF DYING BEES – 24-03-2007 (8.73 MB) Listen Now Guests: Professors Eric Mussen from the University of California, Davis, and Jim Amrine from West Virginia University Subject: We know what happens with the birds and the bees. But it is the Spring of dying bees, and this leads us to ask, “What happens when there are no bees?” Topics include why bees are dying in such big numbers this Spring; what might happen to the food chain should we lose our bees; and what solutions might there be to halt the die-off.

Show #534: Human Rice – 10-03-2007 (8.84 MB) Listen Now Guests: Karen Stillerman, Union of Concerned Scientists and a representative from Ventria Bioscience Subject: The Department of Agriculture has approved the large-scale planting of rice containing human genes. This leads one to ask: “Can those human genes be kept down on the farm?” Topics include why some want to infuse rice with human genes; why some oppose the planting of this rice; and whether the potential benefits of this rice outweigh its potential risks.

http://www.metrofarm.com/mf_Food_Chain_Radio.php

20 March 2007 Biotech industry withdraws GM foods.

Brussels, March 20th, 2007 – The European Union is today discussing the official withdrawal by the biotech industry of five genetically modified (GM) foods and crops, including the first GM crop that was ever grown in Europe. [1] Friends of the Earth Europe has highlighted this as further proof that GM crops are failing. [2]

4] The products being withdrawn are:

Genetically modified maize, Bt176 produced by Syngenta Genetically modified oilseed rape, Ms1xRf1, produced by Bayer Genetically modified oilseed rape, Ms1xRf2, produced by Bayer Genetically modified oilseed rape, Topas 19/2, produced by Bayer Genetically modified maize, GA21xMON810, produced by Monsanto

http://www.foeurope.org/press/2007/March20_HH_withdrawal_GM_crops.htm#1

12 March 2007 GM crops fail EU Lisbon Agenda goals

New research says green farming more competitive

Brussels, March 12th 2007 – Environmentally-friendly farming will create more jobs and make the EU more competitive than if it grows genetically modified (GM) crops, shows new research published today by Friends of the Earth Europe. The research coincides with the expected withdrawal later today of a European Parliament Resolution that promotes GM crops. MEPs are requesting that the text be rewritten because it attacks the precautionary principle and ignores research showing that GM food and farming has not lived up to expectations [1].

Helen Holder, European GMO campaigner at Friends of the Earth Europe, said “The genetic modification approach to farming is failing despite the hype, public funding and political will. Greener farming stimulates the economy, benefits the environment and the public loves it.”

http://www.foeurope.org/press/2007/March12_HH_biotech_mtr_report.htm

Annex A

----- SUCCESSFUL WITHOUT BEING
GENETICALLY MANIPULATED -----

From the debate on “The downside of genetic engineering” 20 October 2001 in Diligentia, The Hague.

The African solution: push-pull

In Kenya the Indian scientist Dr Zeyaur Khan developed an alternative for Novartis Bt maize. Over half of the maize harvest in Kenya is ruined every year by a combined invasion of “witch grass” (Striga) and stem borers. These harmful insects are part of the family of corn borers against which Novartis developed its genetically manipulated Bt maize. The biotechnology company has already launched a programme for testing and introducing Bt maize in Kenya. Khan’s “push-pull” method combats both the weeds and the insects without chemical pesticides or genetic manipulation.

Khan has slides and a video showing the havoc that can be wrought by the weeds and the stem borers in the maize fields of Kenyan smallholders – depressing pictures of maize plants with limply hanging leaves full of holes often surrounded by the treacherously beautiful flowers of witch weed, a parasite that grows on the roots of the maize plant. The seeds of the parasite remain active in the ground for ten years or so.

Khan and his team tested more than 400 types of grass and finally hit on Napier grass, a type that proved to be very attractive to stem borers. A hedge of this type of grass planted around a maize field lures the insects away from the maize. Desmodium was sown between the maize plants in order to make them unattractive to stem borers. It repels the insects and also combats the witch weed as well as fertilising the soil with natural nutrients. That is the “push-pull”

method. The Desmodium repels the stem borers from the maize field and the Napier grass attracts the harmful insects.

http://www.talk2000.nl/docu/bmd_101_verslag-conferentie.html

+ **ORGANIC AGRICULTURE OFFERS HOPE FOR INDIAN COTTON FARMERS** Whilst many farmers in Andhra Pradesh (India) commit suicide out of desperation because of the debts they have incurred as a result of failed GM cotton crops, there is one village where the farmers have no debts and therefore are not committing suicide or moving away. The farmers have shown that there is hope for the future in agriculture without pesticides, artificial fertilisers and GM crops. It is the first village in the country which has declared itself to be free of GMO and chemicals. <http://www.gmwatch.org/archive2.asp?arcid=7142>

+ **HAS THE GM COTTON HYPE COME TO AN END?** Cotton farmers throughout the country are following the example of Andhra Pradesh by turning their backs on pesticides and Bt cotton seeds. And there are no pests. Why? There are 28 natural predators of the American bollworm, cotton's worst enemy. If you stop spraying pesticides, you give these useful insects an opportunity to keep the bollworm under control. <http://www.gmwatch.org/archive2.asp?arcid=7103>

+ **'SEED COMPANIES SPECIALISE IN GMO-FREE SEED' – WALL ST JOURNAL.** In a report on the second biotechnological Green Revolution, the Wall Street Journal writes about seed companies specialising in GMO-free seeds which they improve by marker assisted breeding (see glossary below). Research director George Kotch of Syngenta AG's North American vegetable seeds department says "The public is lukewarm on GMO products [!!]. Marker Assisted Breeding is a technology that doesn't have an image problem". <http://www.gmwatch.org/archive2.asp?arcid=7209>

Other reports from www.gentech.nl

Letters accompanying the signatures and supplementing the notice of objection (letter 1). Lelystad, 2 April 2007.

Ministerie van VROM

p/a Bureau GGO

Postbus 1

3720 BA Bilthoven

Dear Ms Cremers,

We hereby enclose some more signatures objecting to the market authorisation of GT73 oilseed rape and for GMO-free Netherlands. We have sent you 274 already, which now brings the total to 417.

If we receive any more signatures we will send them too.

Yours sincerely,

Miep Bos, Wieteke van Dort and other concerned citizens, the foundations mentioned in the notice of objection and (organic) farmers.

miep@gentechvrij.nl

www.gentechvrij.nl

www.wietekevandort.nl

Lelystad, 3 April 2007.

Accompanying letter 2.

Ministerie van VROM

p/a Bureau GGO

Postbus 1

3720 BA Bilthoven

Dear Ms Cremers,

We hereby enclose some more signatures objecting to the market authorisation of GT73 oilseed rape and for GMO-free Netherlands. We have sent you 417 already, which now brings the total to 477.

If we receive any more signatures we will send them too.

The text below is in support of the notice of objection:

The people lodging the notice of objection are wondering: "How can 80-90% of the bee populations in the USA have died this spring? The name given to this is Colony Collapse Disorder (CCD). USA bee expert Professor Eric Mussen of the University of California says that malnutrition is definitely to blame. Bees are dependent on healthy pollen for their food, from which they get their cholesterol (see notice of objection <http://www.gentechvrij.nl/bezwaarkoolzaadgt73.html> and click on the link to the radio broadcast). Bees are indispensable for at least 100 crops. Dr Albert Einstein said once: "Without bees humans have four years to live".

Yours sincerely,

Miep Bos, Wieteke van Dort and other concerned citizens, the foundations mentioned in the notice of objection and (organic) farmers.

miep@gentechvrij.nl

www.gentechvrij.nl

www.wietekevandort.nl

Lelystad, 4 April 2007.

Accompanying letter 3.

Ministerie van VROM

p/a Bureau GGO

Postbus 1

3720 BA Bilthoven

Dear Ms Cremers,

We hereby enclose some more signatures objecting to the market authorisation of GT73 oilseed rape and for GMO-free Netherlands. We have sent you 477 already, which now brings the total to 500.

If we receive any more signatures we will send them too.

Yours sincerely

Miep Bos, Wieteke van Dort and other concerned citizens, the foundations mentioned in the notice of objection and (organic) farmers.

miep@gentechvrij.nl

www.gentechvrij.nl

www.wietekevandort.nl

Lelystad, 5 April 2007.

Accompanying letter 4.

Ministerie van VROM

p/a Bureau GGO

Postbus 1

3720 BA Bilthoven

Dear Ms Cramer,

First of all I would like to apologise for spelling your name incorrectly in the previous three accompanying letters.

We hereby enclose some more signatures objecting to the market authorisation of GT73 oilseed rape and for GMO-free Netherlands. We have sent you 500 already, which now brings the total to 528.

If we receive any more signatures we will send them too.

Yours sincerely

Miep Bos, Wieteke van Dort and other concerned citizens, the foundations mentioned in the notice of objection and (organic) farmers.

miep@gentechvrij.nl

www.gentechvrij.nl

www.wietekevandort.nl

This letter has also been sent via e-mail due to a lack of time.

Lelystad, 6 April 2007.

Accompanying letter 5.

Ministerie van VROM

p/a Bureau GGO

Postbus 1

3720 BA Bilthoven

Dear Ms Cramer,

We hereby enclose some more signatures objecting to the market authorisation of GT73 oilseed rape and for GMO-free Netherlands. We have sent you 528 already, which now brings the total to 550 (*Platform Belangen van Consumenten*).

If we receive any more signatures we will send them too.

Yours sincerely

Miep Bos, Wieteke van Dort and other concerned citizens, the foundations mentioned in the notice of objection and (organic) farmers.

miep@gentechvrij.nl

www.gentechvrij.nl

www.wietekevandort.nl

This letter has also been sent via e-mail due to a lack of time.

After this we received 15 more signatures making a total of 565 (as at 13 April 2007).

3. Environmental risk assessment

See Others

4. Conclusions and recommendations

See Others

5. Others

See Others

6. Labelling proposal

No labelling because we don't want green light for this GT73 oilseed rape.

Organisation: Individual/biodlare

City: Skövde

Country: Sweden

Type: Individual

Public: Yes

a. Assessment:

Molecular characterisation

Jag ser det här med GMO grödor som ett stort hot mot fortsatt biodling i sverige. Raps är en av de grödor som är huvudsakliga dragväxter för bin. Att kunna separera detta från biodling ser jag som omöjligt. Vår svenska bistam kommer snart att vara utdöd och därmed kommer det ekologiska ekosystemet vara stört. Fåglar kanske även de får i sig detta gift/resistens som kommer att finnas i rapsen, (konsekvenserna vet vi ej). Detta gör att det oundvikligen så småningom även kommer finnas i vår fauna som jagas av våra jägare och slutligen kommer säkerligen vi människor att konsumera detta onaturliga. Den kortare vägen är givetvis att rapsen även används av oss människor direkt som livsmedel även om det som jag förstår det skall användas som bränsle.

Hur kan man tänka sig att föra in detta i faunan och inte veta hur det kommer att utvecklas / korsbefruktas.

Vi är skyldiga naturen att vara mera försiktiga.

Translation

I see GM crops as a major threat to the survival of beekeeping in Sweden. Oilseed rape is one of the main melliferous crops for bees. It is impossible to separate it from beekeeping. Our Swedish bee population will soon become extinct and the ecological ecosystem will be disrupted. Birds may also absorb the poison (resistance) which will be present in oilseed rape (with unknown consequences). It makes it inevitable that, over time, it will be found in animals hunted by our hunters and we humans will, in all likelihood, consume these unnatural substances. The shorter absorption path is of course for oilseed rape to be used by humans directly as food, even though I gather it is to be used as fuel.

How can one think of introducing this into fauna without knowing how it will evolve/be cross-fertilised.

We owe it to nature to be more cautious.

Organisation: pimgoezinnen

Country: The Netherlands

Type: Individual

a. Assessment:

Others

Ik wil helemaal geen genetisch gemanipuleerd voedsel. Onderzoek hiernaar is veel te eenzijdig, voornamelijk uitgevoerd door producenten zelf. Het is nu toch wel duidelijk dat belanghebbenden (in welke branche dan ook !!) alleen maar publiceren wat past binnen hun strategie om een zo'n groot mogelijke markt voor zichzelf te creëren.

Wanneer deze producten beter zouden zijn dan wat er al honderden jaren wordt verbouwd dan zou GOD dit zelf wel hebben ontwikkeld.

Ga zelf eens Googelen op dit onderwerp en lees dan wat er allemaal mis is met genetisch gemanipuleerd voedsel.

Laat de politiek verantwoordelijken eens verder kijken dan het lobbycircuit want over een paar jaar wanneer er veel meer duidelijk zal worden over het rampscenario van GMO dan zijn de dames en heren opnieuw ""verbijsterd""

Translation

I do not want any genetically manipulated food at all. The studies on them are much too one-sided and mainly carried out by the producers themselves. It is clear that interested parties (in whatever sector it may be!!) only publish what fits into their strategy in order to create as large a market for themselves as possible.

If these products were better than those cultivated for hundreds of years then God himself would have developed them.

Just Google this subject and read what is going wrong with genetically manipulated foods.

Those in positions of political responsibility should, for once, look further than the lobby circuit because in a few years when it is much clearer what a disaster GMO is they will be “appalled” once again.

5. Others

Ik ben tegen genetisch gemanipuleerd koolzaad. De gevolgen voor het milieu zijn absoluut niet te bepalen. Alleen de producent Monsanto is degene die hier beter van wordt. Een kwalijke zaak dat de politiek opnieuw zich zelf verkoopt aan een producent zonder zelf deugdelijk onderzoek hiernaar te laten verrichten door een onafhankelijke partij.

Translation

I am against genetically manipulated oilseed rape. It is absolutely impossible to determine the effect on the environment. The producer Monsanto is the only one to gain from this. It is regrettable that politicians are selling themselves once again to a producer without having a reliable study carried out by an independent party.

Organisation: burgers voor gentech-vrij voedsel

Country: The Netherlands

Type: Individual

a. Assessment:

Others

Zolang onze nederlandse overheid geen onafhankelijk onderzoek doet naar de gezondheidseffecten voor zowel mens, plant en dier, is het voor mij volstrekt duidelijk dat gmo voedsel niet mag worden toegestaan. De EFSA is teveel gekoppeld aan het bedrijfsleven en hebben zelf te weinig middelen in huis om langdurig grondig onderzoek te doen. Het weinige onafhankelijk onderzoek dat gedaan wordt geeft luid en duidelijk aan dat we ons met gmo voedsel in de gevarenzone begeven.

Translation

As long as our Netherlands Government does not carry out any independent study on the health effects for both humans, plants and animals it is quite clear to me that GMO food may not be approved. The EFSA is too close to the business community and has too few resources in-house in order to carry out long-term and thorough studies. The few independent studies that have been carried out make it very clear that we are treading on thin ice with GMO food.

3. Environmental risk assessment

We mogen de natuurlijke samenhangen in de natuur niet laten verstoren door commercieel aangestuurde bedrijfsbelangen. Zolang we niet weten wat de effecten zijn op de micro-organismen in het bodemleven en in het water, zolang we niet weten wat de lange termijn effecten zijn op het insectenleven, zolang er nog zoveel vragen zijn is mijn mening: NIET DOEN! Coexistentie is een onmogelijke zaak. We hebben het over voedsel. Lucht kan je ook niet scheiden.

Translation

We cannot let the balance of nature be disrupted by commercially motivated business activities. As long as we do not know what the effects are on the microorganisms in the soil and in the water, as long as we do not know what the long-term effects will be on insect life and as long as so many questions are open, my opinion is DON'T DO IT! GMO cannot coexist with other crops. We are talking about food here. You cannot fence off spaces in the air either.

4. Conclusions and recommendations

Gentech-gewassen zijn een uitvinding van chemie-bedrijven. Geen enkele consument heeft gevraagd om gmo voedsel. De grote meerderheid van consumenten in EU wil geen! gmo voedsel. Waarom blijft de overheid dit dan toch de markt op pushen met valse beloftes als "gentech-voedsel gaat de honger oplossen", "met gentech minder pesticide gebruik". Het wordt de hoogste tijd dat de overheid weer in dienst komt van zijn burgers ipv in dienst van het bedrijfsleven. Aanbeveling: NO TO GMO!

Translation

GMO crops are an invention of chemical companies. Not a single consumer has asked for GMO food. The vast majority of consumers in the EU do not want GMO food. Why does the Government then persist in pushing it on the market with false promises such as "GMO food is going to solve hunger" in "fewer pesticides are used with genetic engineering". It is high time for the Government to go back to serving the population instead of serving the business community. My recommendation is: NO TO GMO!

5. Others

Gmo vormt een ernstige bedreiging voor de wereld. Als deze ontwikkeling zich voortzet dan zal het boerenleven van onze aardbodem verdwijnen en voedsel wordt volledig overgenomen door het bedrijfsleven. Mega "dieren-opvokfabrieken" met gepatenteerde varkens, kippen, koeien, konijnen, kippen, geitjes, kalkoenen komen onder beheer van fabrieksdirecteuren. En de boer van nu kan iets anders gaan doen. De boer van nu zit ook gevangen in het web van neo-liberalisme, waarin al het leven aan de markt wordt overgelaten. Het contact met zijn dieren is de boer van nu allang kwijtgeraakt. Hij heeft zijn macht jaren geleden al uit handen gegeven toen de Rabobank de boeren ging vertellen dat het allemaal groter moest. Nu al zie je dat kleine boeren in Latijns-amerika van hun grond verdreven worden en plaats moeten maken voor grote monoculturen. Diversiteit verdwijnt. Ik wil voedsel kunnen blijven eten waar in ik als mens bij betrokken ben. Ik wil voedsel kunnen eten waar de boer als mens bij betrokken is. Ik wil voedsel kunnen eten wat natuurlijk is, zonder pesticides, natuurlijk gerijpt en in een natuurlijke tempo gegroeid. Ik wil voedsel kunnen eten wat zonlicht heeft gezien. Ik wil voedsel kunnen eten wat met liefde is verbouwd en met liefde en aandacht is grootgebracht. GMO voedsel past hier niet in.

Translation

GMO is a serious threat for the world. If this development continues, life as a farmer will disappear from the face of the earth and food will be taken over entirely by the business community. Mega "animal-rearing factories" with patented pigs, chickens, cows, rabbits, kids and turkeys will come under the control of factory managers and the people who are now farmers will have to go and do something else. Today's farmers are now caught in a web of neoliberalism where all aspects of life are left to the market. They have now lost contact permanently with their animals. They let power slip from their hands years ago when the Rabobank went to them and told them that everything had to expand. Now you are seeing smallholders in Latin America being driven from their land to make room for large monocultures. Diversity is disappearing. I want to continue eating food I am involved in as a human being. I want to be able to eat food that farmers are involved in as human beings. I want to be able to eat food that is natural without pesticides and which has ripened naturally and has grown at its own pace. I want to be able to eat food that has seen the light of the sun. I want to be able to eat food which has been planted and cultivated with love and care. GMO food does not fit the bill.

6. Labelling proposal

Al het voedsel dat afkomstig is van dieren die gevoed zijn met gentech-gewassen (gentech-mais en gentech-soja) labelen zodat de consument een betere keuze kan maken en niet in het ongewisse blijft.

Translation

All food from animals fed with GMO crops (GMO maize and GMO soya) should be labelled so that consumers can make a better choice and are not left in the dark.

Organisation: PrivateMind

Country: Sweden

Type: Individual

a. Assessment:

5. Others

It feels like Monsanto have a enormous power- they can just change ecosystem when and how they want. I think that excuses like 'we're going to feed a lot of people in third world' are really inhuman. How can you feed somebody with GMO food if you don't know the influence on others life and the impact upon environment? I am totally against GMO.

Organisation: Testbiotech e.V.

Country: Germany

Type: Non Profit Organisation

a. Assessment:

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

Oilseed rape contains several constituents that are anti-nutritional. In the studies delivered by Monsanto and Caine et al. (2007), mainly glucosinolates are mentioned. But according to member states' comments on the application of GT73, there are also other anti-nutritional factors which were not taken into account. For example, the Netherlands Ministry of Agriculture points to a key document published by the FAO (Anonymus). In this document, sinapine, tannins and erucic acid are filed as anti-nutritional factors. And according to a OECD document on low-erucic-acid rapeseed, also the following constituents, in addition to the key nutrients and toxicants, may be considered if a compositional analyses of rape seed is considered:

“Macro and trace minerals may be considered in the evaluation of low erucic acid rapeseed [...]. Tannins and sinapine are considered to be minor antinutrients in low erucic acid rapeseed meal. Sinapine is the major phenolic compound in low erucic acid rapeseed which imparts a bitter taste. Phytic acid is the major form of phosphorous in plants. Although largely

unavailable to the animal, phytic acid may have an impact on other mineral bioavailability.” (OECD, 2001)

Referring to this document, the Netherlands Ministry of Agriculture states (EFSA 2009c):

“In 2001, a consensus document of the OECD has been published, in which a number of key nutrients and anti-nutrients has been listed that are recommended to analyse for a comparative assessment of GM oilseed rape. For several analyses mentioned in this list, no statistical analysis has been provided for GT73 oilseed rape (several amino acids, fatty acids). [...] In addition, for some other nutrients, no data at all have been provided in the dossier (minerals). Without these additional data a proper evaluation of the compositional equivalence of GT73 is not possible, therefore such data should be provided.”

And the Belgian Biosafety Advisory Council notes (EFSA 2009c):

“It is recognised in the dossier that tannins, saponins and sinapine are substances that may restrict the use of oil seed rape meal in animal foodstuffs [...]. Thus it is surprising that no values for tannins and saponins are reported.”

The member states’ requests for more data are not taken into account by the GMO panel. Therefore, important data on the compositional equivalence of GT73 oilseed rape with great importance for scientific understanding of the nutritional safety of GT73 oilseed rape are missing.

b. Food Safety Assessment: Toxicology

As pointed out by member states (EFSA 2009c) and other stakeholders (Greenpeace 2004), several of the studies are either flawed or even lead to serious doubts about the safety of GT73 oilseed rape. Of the ten studies mentioned above, three are so seriously flawed that even EFSA didn’t take them into account (rat study 1994, trout study 1994, quail study 1993). During the consultation process concerning the renewal of approval of GT73 oilseed rape member states voiced serious concerns about the standards and outcome of some of the studies that were not properly addressed by EFSA. Furthermore, Monsanto’s own technical reports indicate that also most of the other studies are flawed. The food safety of GT73 therefore cannot be claimed on the basis of the presented reports and studies.

1. Rat studies

Rat Study (1994) As EFSA states correctly, Monsanto failed in keeping two different GM lines that were to be tested apart from one another. There was a mixture of GT200 and GT73 canola (in a ratio of approximately 1:1) that makes the study worthless. It was therefore not considered in EFSA’s opinions on GT73. But another fact not mentioned by EFSA is that the non-GM varieties used in this test were contaminated with GT 73 during cultivation. According to the documents available, it is very likely the plant material that was used for testing came from the same contaminated source as in the first trout study (see below) where GM oilseed rape (canola) was grown only meters away from non-GM canola (MADGE 2009).

Rat study (1995) In a follow-up study conducted by Monsanto the animals' liver weights were slightly, but significantly, increased by approximately 9-16% in rats fed diets containing 15% GT73. EFSA declares these findings as "incidental". The origin of the plant material used in this study remains unclear, and there is no indication that the control and the non-GM varieties were not contaminated with transgenic material. The outcome of this test still leads serious to doubts by member states. Austria notes (EFSA 2009c):

"In the second rat study (Naylor 1995) only processed meal was fed. Despite this fact liver weights differed between groups. It is of special interest to investigate the meal without heat treatment as transproteins are heat labile. Further, this is an indicator for carrying out a more appropriate study design for toxicological approach and a 90 day rodent toxicity study including microscopic evaluation is therefore highly recommended."

EFSA disregards this proposal for reasons unknown.

Rat study (1996) Monsanto then conducted a third rat study. Its purpose was to determine whether the liver and kidney weights of rats fed GT73 fall within the range of liver and kidney weights of rats fed processed meal from nine commercial varieties of canola from Canada and oilseed rape from Europe. In other words, this study was not conducted to compare GT73 with the isogenic lines grown under similar conditions but conducted with controls from a wide range of different sources from different continents. Austria states (EFSA 2009c):

"The more varieties used, the higher is the variability and the lower the likelihood of statistically significant differences."

Furthermore, the fraction of rapeseed meal in the rats' diets was reduced from (a maximum of) 15 % to 10 %. Predictably and according to EFSA, the study

"did not reveal any significant difference in weight gain, feed intake or organ (liver, kidney) weights between rats fed GT73 and the parental Westar line and the commercial lines."

But, as stated in a member state comment by the Belgian Biosafety Authority (EFSA 2009c), the fact

"that such an effect was not observed in the second study can be explained by the use of a lower dose level in the second study (10% instead of 15% (the limit of use in monogastric diets, OECD, 2001)). In addition, in the repeated dose toxicity studies, a maximum concentration of 15% oilseed rape meal was used, whereas up to 30% will be included in feed of ruminants. Effects on such dose levels on, for instance, liver effects are not known. Therefore, the dose levels used are too low to draw conclusions on the nutritional equivalence and safety for all food/feed uses."

This third study seems therefore to be deliberately designed to mask differences that occurred in the second rat study and should not be considered.

2. Trout studies Two studies on rainbow trout were done on behalf of Monsanto. The outcomes were published by Brown et al. (2003). The first study seems to have incorporated the same kind of rapeseed meal as the first rat study (1994) as the same mixing error is reported. The authors state:

“In the first study, two lines of GTC, designated GT200 and GT73, and a parental line, Westar, were used. [...] However, because of a mixing error that occurred prior to the first study, samples of seed labelled GT200 and GT73 were essentially equivalent in composition.”

For this reason, the study is not considered in EFSA’s opinion. But in addition, the non-GM rapeseed meal that was provided for the trial was grossly contaminated, because, the different GM and non-GM varieties were grown side by side in plots at a number of sites in Canada. Of course, this led to massive contamination of the non-GM varieties with the GM constructs present in GT73. In an analysis done by MADGE, an Australian NGO, (MADGE, 2009) Monsanto’s own technical reports are quoted to underpin this thesis.

According to the document published by MADGE which investigated the conditions under which the GE canola used for the first feeding study was grown, the control samples were contaminated. But also the GE samples, meant to be used to examine potential health effects were diluted by pollen from neighbouring fields:

“However, no pollen barriers were erected. In the same trial plot area there was a plot of non-GM Westar seed which was to be used as the comparison feed for the trout. It was planted within meters of the GM feeding trial plots in some cases. This meant that the GM plants could be contaminated by the non-GM, and that the control non-GM Westar could be contaminated by the GM plants. Furthermore, Monsanto required that these GM and non-GM plots be surrounded by a 10m border of the non-GM Westar parent plant, without specifying the distance. At least one border was planted within 1.5m of the heterozygous GM canola plants, another at 2.5m. It is to be deduced that cross-pollination from these parent plants would have resulted in further reduction of the GM component of the final seed. What is evident is that Monsanto began with a dilute GM crop line, and surrounded the plots with material that would further dilute it. Furthermore, although not reported, it appears certain that the non-GM Westar plot used in the trials would have been GM contaminated. (...)” There was a more profoundly bizarre twist. Strangely another GM canola line (GT200) was in duplicate side-by-side plantings, as close as 0.25m from the heterozygous GT73 line intended for the feeding trials.”

There is no indication that the way of cultivating GT73 was changed for the follow-up study (apart from the exclusion of GT200). As the published study (Brown et al. 2003)- referring to both tests – states:

“All lines of canola were grown in the same field test sites in Canada”

So there is no way of securing that Monsanto didn’t simply compare a GM variety with different highly contaminated non-GM varieties. The study therefore cannot be considered as long as there is a proof that the non-GM varieties were indeed GM-free.

3. Pig study (2007) Recently a further study was conducted and published. Pigs received diets containing 15% processed meal derived from GM oilseed rape GT73, its control or two commercial reference oilseed rape lines (Caine et al., 2007). According to EFSA, the study

“did not indicate any impact of the genetic modification on animal performance” (EFSA 2009b).

But as in the second rat study (1995), liver weights of animals fed GT73 oilseed rape were higher than in the other groups (though not statistically significant), whereas carcass yield of was lowest of the four groups tested. Regarding Roundup Ready Canola (RRC), the study says:

“Pigs receiving the PCC and RRC diets had heavier ($P = 0.002$) liver weights than those pigs fed the COM1 and COM2 diets (2.06 and 2.05 kg vs. 1.95 and 1.96 kg, respectively).”

In another study were GT73, isogenic control and non-GM varieties were fed to lambs (Stanford et al., 2003), liver weights were not measured, but only observed by appearance.

4. Quail studies A study was conducted on quails that were fed GT73 and commercial non-GM varieties and a control, respectively. The quails were fed for only 5 days (!) on diets which included 20% unprocessed meal. As in the first rat study and the first trout study, GT73 was co-mingled with GT200. The study is therefore not considered by EFSA. A follow-up experiment was conducted, again for only five days. Despite the narrow timescale, the second study did reveal that the

“...quails in the GT73 group exhibited a slight reduction in body weight gain during the exposure period (day 0 – day 5). However, there was no reduction in body weight gain for the entire test duration (day 0 – day 8).” (EFSA 2004)

EFSA concludes, “All birds appeared normal when the study was terminated three days later.” So the GT73 quails suffered weight loss during the time they were fed GT73, and only recovered in the subsequent three days when they were no longer fed GT73. Yet the findings are ignored by EFSA in all three opinions. Proper results of the study would have been of high interest as, unlike in most of the other feeding studies, unprocessed GT73 oilseed rape meal was used.

5. Chicken study (2004) Rapidly growing broilers were used to compare diets containing GT73 oilseed rape with the parental and six commercially available oilseed rape varieties (Taylor et al., 2004). According to EFSA:

“No significant differences were observed in the performance parameters (growth, carcass fat pad, breast meat, thighs, legs, wings, chill weight; percentage of moisture, protein and fat in breast or thigh meat) between the GT73 and parental oilseed rape groups.”

As for the cultivation of the RR canola, the published study states:

“Oilseed of glyphosate-tolerant (Roundup Ready event RT73) and non-transgenic control canola varieties was commercially produced and harvested in 1999 in Manitoba, Canada.”

A technical report by Monsanto reveals that the non-GM canola varieties used for this study were contaminated with the RR gene construct (Monsanto report 2000-01-43-10, document available at Testbiotech). According to Monsanto,

“this finding was not unexpected given the prevalence of commercial RR canola in Canada (Country of material origin).”

It is well known that in Canada it is nearly impossible to cultivate GE free oilseed rape (canola) or even to get GE free canola seed (Friesen et al 2003).

Furthermore, the animals were fed very large amounts of both corn and soy. It’s not mentioned whether these were GM varieties, containing the same GM genes as the GM canola. Also in this study, the pigs’ meals were prepared at different temperatures. It’s evident that this study is flawed and can’t be considered as proof for the safety of GT73.

Allergenicity

Some of the studies show some significant differences between GE and conventional rape seed. These effects might be comparable to effects observed with a GE pea expressing an amylase inhibitor: Several studies in pigs, sheep, rats and poultry did not reveal severe health reactions, but only some differences in weight gain (several parameters), resulting in some unclear overall outcomes regarding health risks. Only targeted studies on immunological reactions of mice revealed a substantial health risk of these GE products (see for review Valenta&Spök, 2008). In the case of GT73 several questions were raised by member states concerning immunological reactions and the GOX protein. There were no testing with wholesome GE oilseed GT73 to investigate potential immune reactions.

Nutritional assessment

see above

Others

Apart from the nutritional studies, there is at least one other study that should have been considered by EFSA. In a study by Sharma et al. (2006), fragments of GM canola DNA (CP4 EPSPS transgene) were found in the digestive tissues of sheep and pigs and in the liver and kidney of pigs. In none of its opinions regarding GT73 does the GMO panel refer to this important study and its implication for animal or human safety.

As far as we can see, the impact of GE rape seed sprayed with glyphosate was not investigated thoroughly, but would be relevant in the light of some recent studies (Benachour et al, 2008)

4. Conclusions and recommendations

Testbiotech has come to the conclusion that health risks of GT73 have to be subjected to further investigations before any market authorisation for food and feed can be given. The opinion of EFSA should be rejected by the EU Commission.

5. Others

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