

# km-000h71-4

---

## GM Food & Feed – Comments from the Public

### Comments received on sugar beet KM-000H71-4

The total number of the received comments is 12, but the authors of three of these comments did not agree that their comments could be published on the present website.

1. private person, SE
2. private person, FI
3. private person, FI
4. Consiglio dei Diritti Genetici, IT
5. Demeter, FI
6. Kahvila-ravintola kotipirtti, FI
7. Puu- ja erityisalojen liitto, FI
8. University, SE
9. Nätverket för EU-kritik, SE

---

**1. Organisation: ekoreko**

**Country: Sweden**

---

**a. Assessment:**

**6. Labelling proposal**

It's most disturbing for us, individual, when companies make changes to our earth just for their money interest. What have we become when we change the DNA in foodvegetables just so they can resist chemicals which make damages to the nature surrounding the foodvegetables. All this just for profit to a company -not for more food to already starving people. Do we really know the risk? Do we really dare to take a chance? Haven't we failed already? I beg, to anyone, on my bleeding knees -Please do something - you who can!

---

---

## **2. Organisation: none**

**Country: Finland**

---

### **a. Assessment:**

#### **Molecular characterisation**

do not genetically modify food or anything else!!!! don't let anybody else do it either!!!

---

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

do not genetically modify food or anything else!!!! don't let anybody else do it either!!!

---

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

#### **Toxicology**

do not genetically modify food or anything else!!!! don't let anybody else do it either!!!

---

#### **Allergenicity**

do not genetically modify food or anything else!!!! don't let anybody else do it either!!!

---

#### **Nutritional assessment**

do not genetically modify food or anything else!!!! don't let anybody else do it either!!!

---

#### **Others**

do not genetically modify food or anything else!!!! don't let anybody else do it either!!!

---

## **3. Environmental risk assessment**

do not genetically modify food or anything else!!!! don't let anybody else do it either!!!

---

## **4. Conclusions and recommendations**

do not genetically modify food or anything else!!!! don't let anybody else do it either!!!

---

## **5. Others**

do not genetically modify food or anything else!!!! don't let anybody else do it either!!!

---

## **6. Labelling proposal**

do not genetically modify food or anything else!!!! don't let anybody else do it either!!!

---

---

**3. Organisation: private citizen opinion**  
**Country: Finland**

---

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

The information seems to be complete enough.

---

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

The work is done properly.

---

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

I agree with the specialists that toxicity has not been seen and is not awaited.

---

**Allergenicity**

I agree with the experts that allergenicity is not awaited in consequence with the new protein. Concerning sugar, in this end product there is no protein even present.

---

**Nutritional assessment**

The main nutritional element here is sugar. It is not affected by the genetic modification.

---

**3. Environmental risk assessment**

As this evaluation does not include producing sugar beet, there is no environmental element concerning Europe.

---

**4. Conclusions and recommendations**

Properly made.

---

**5. Others**

OK

---

**6. Labelling proposal**

Evaluation seems to be thoroughly done. The products seem to be safe to a higher extent than generally demanded for ordinary marketed food.

---

---

## **4. Organisation: Consiglio dei Diritti Genetici**

**Country: Italy**

---

### **a. Assessment:**

#### **Molecular characterisation**

We would like to underline that, even if description of inserted DNA is quite detailed, the document about the DNA sequence is confidential (Kraus, 2003). We don't understand the necessity to consider this document confidential : there is in fact a specific patent on this application (Patent WO2004074492). Indeed, we don't have neither information about the genomic DNA sequences around the insertion site nor information related on other insertions or rearrangements happened at the insertion site.

---

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

The compositional analysis shows that there are statistically significant differences in some compounds between the GM sugarbeet and the conventional one used as control. It means the biochemical pathway of the sugarbeet has been changed in some way. We agree with the comments submitted from Austrian Ministry for Health and Women that the compositional analysis should be extended, in order to use the GM sugarbeet like feed.

---

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

#### **Toxicology**

We agree also with the Austrian Ministry for Health and Women about the comments on feeding studies and the comments on the assessment of any potential allergenic and toxic effects of GM H7-1 sugarbeet. In particular, we believe that feeding studies should be conducted using not only pulp but the whole sugarbeet, especially with part of root that could contain molasses and sugar and are not tested at the moment. The pulp is not representative of the whole sugarbeet that would be used as feed. We also believe that Monsanto should proof that no transgenic DNA could be in sugar derived from GM sugarbeet. We definitely don't agree with the answer given from the GMO-panel. On feeding studies, we think that 3-week performance study on sheep could be representative of nothing. A feeding study should be conducted for a period of time enough to verify possible unpredictable effects, otherwise it is useless.

---

#### **Allergenicity**

On potential allergenic effects, we don't agree with the GMO-panel. We believe that the risk of unpredictable effects is not foreseeable. More analysis, and not comparison with the literature but experimental analysis, should be conducted, to verify the absence of any potential unintended enhancement of the allergenic potential in the GM H7-1 sugarbeet.

---

### **3. Environmental risk assessment**

We agree with the Austrian Ministry about the equivocal behaviour of the notifier. If parts of roots and vegetal portion of the plant could be present in the feed, the notifier has to consider the possibility that the plant could germinate in favourable condition. The answer from the

GMO-panel seems inadequate. Also the answer given to the Greek Authority seems to us inadequate. The unwilling growth of GM sugarbeet could change the natural biodiversity: many are in fact the species sexually compatible with the sugarbeet in the south of Europe. The GMO-panel considers the data on environmental assessment already presented in the notification C/DE/00/8. We would like to underline that the notification C/DE/00/8 has not been approved or authorised yet. The GMO-panel can't use data of a not yet approved notification to justify or guarantee data submitted in this notification.

---

---

## **5. Organisation: Demeter Finland**

**Country: Finland**

---

### **a. Assessment:**

#### **Nutritional assessment**

Dear comission of EU.

Letting GMO products on the fields and / or on the market is a step which is difficult to take back. GMO products' safety cannot be confirmed in no reliable way as the un expectable effects on nature and human helth can rice after 50 or 100 years. It's not fair to say yes to a technology thats' effects are not known. Animal tests that last for their life time is nothing to rely on. Neither is even effects on people like americans - such a shoert time has passed since GMO - production started there.

I don't want GMO nutrition in any form. Science has no methods of proofing it's safe. Please keep GMO out of European Union.

---

#### **Others**

It sounds concerning that the reason for taking the GMO sugarbeet products on the market is a possibility to use glyfosate. One should be aware that non of these poisons' effect on helth still are not known - in a long distance. In name of reasonability and safety i hope GMO - products to be overlined with wide red line.

---

### **3. Environmental risk assessment**

The GMO products have a tendence to contaminate the surrounding areas - fields and nature. This can destroy the market of the non - GMO farmers and this way cause serious economical effects. This has happened in Hawaii with papaya-tree farmers 1998 and in USA with soya farmers (see "GM contamination register report" by GeneWatch UK and Greenpeace international)

When a GMO plant makes hybrids with natural plants it can lead to plants that harm the ecosystem in the surrounding nature. This can lead to a collapse of some species and further on the food chane as a whole. And that collapse cannot be replaced.

---

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

In this matter the only responsible way is to refuse of the products thats' production can harm the environment even though outside EU. EU needs to show intelligence and responsibility by supporting safe and ethical food production. This is the view the big companies lack.

---

### **5. Others**

Altogether all the products that include GM material, should always be labelled. The consumers have to have the possibility to make the desition of excluding GM nutrition.

**6. Organisation: kahvila-ravintola kotipirtti**  
**Country: Finland**

---

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

Olen sitä mieltä, että muuntogeenien käyttö elintarvikkeissa pitää kieltää. Todennäköisimmin räjähdysmäisesti lisääntyneet ruoka-aineista johtuvat allergiat ja sairaudet johtuvat pääosin näistä syistä.

**Translation:**

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

I am of the opinion that the use of manipulated genes in foodstuffs should be prohibited. It is most likely that the reasons of explosively increased allergies and illnesses are mainly caused by these reasons.



## **7. Organisation: Puu- ja erityisalojen liitto**

### **Country: Finland**

---

#### **a. Assessment:**

##### **Molecular characterisation**

Geenimuunneltujen organismien rakenne on epävakaata. Tämä saattaa aiheuttaa ikäviä yllätyksiä kuluttajille ja tässä tapauksessa esim. eläimille jotka rehua syövät.

---

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

##### **Toxicology**

Sokerijuurikas, joka on muunneltu kestävämpään torjunta-ainetta voi myös sisältää enemmän torjunta-ainejäämiä. No good.

---

##### **Allergenicity**

Allergisoivuus on mahdollista, riippuen tietysti siitä, mitä genejä juurikkaaseen on siirretty.

---

##### **Nutritional assessment**

Geenimuuntelu tuskin parantaa sokerijuurikkaan ravintoarvoja. Ja vaikka näin olisikin, en silti pidä sen käyttöä tai viljelyä hyväksyttävänä.

---

#### **3. Environmental risk assessment**

Jos gmo-sokerijuurikas risteytyy joidenkin luonnonkasvien kanssa, niistä voi tulla ns. superrikkaruohoja, joihin eivät torjunta-aineet enää tehoa. Geenimuunnelluilla organismeilla voi olla negatiivisia vaikutuksia myös maaliööstöön ja ravintoketjuihin.

---

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

Hortonomina ja kuluttajana suosittelen, että gmo-sokerijuurikasta ei oteta myyntiin, viljelyyn tai mihinkään käyttöön EU:n alueella. Vaikka juurikasta ei heti viljeltäisi täällä, tällaiset käyttöönotot ovat takaportteja, jotka tekevät tulevien gm-organismien käyttöönoton vastustamisesta aina vaikeampaa. Geenimuuntelun suhteen pitäisi noudattaa äärimmäistä varovaisuusperiaatetta, muuten meistä kaikista tehdään tahtomattamme koe-eläimiä. Lisäksi, mitä gmo-viljelyyn tulee, kun muunnellut geenit ovat kerran pellolta karanneet, niitä on käytännössä mahdotonta saada kiinni ja tuhota. Geenisaastunta on siis ikuista ja tämä voi aiheuttaa vakavia seurauksia luonnon biodiversiteetille.

---

#### **5. Others**

Jos gmo-sokerijuurikkaan myynti kuitenkin päätetään sallia, pitää sitä sisältäviin tuotteisiin merkitä ISOIN KIRJAIMIN varoitukset, vaikka sokerijuurikasta olisi vain 0,00001 % tuotteesta tai vaikka juurikasta ei lopputuotteessa enää olisi (eli sitä olisi käytetty vain valmistusprosessin aikana). Jos juurikasta käytetään eläinten rehuna, on näiden eläinten

tuottamaan maitoon, lihaan, muniin, villaan, nahkaan, jne. merkittävä että rehuna on käytetty geenimuunneltuja kasveja. Kaikki muu on kuluttajien harhaanjohtamista, tiedon pimittämistä ja valinnanvapauden estämistä.

---

## **6. Labelling proposal**

Suosittelen myös, ettei EU:ssa oteta käyttöön rinnakkaiselon sallivia direktiivejä. Tavanomaisten ja gmo- kasvien rinnakkaiselo pelloilla ei tule kysymykseen, sillä mehiläiset voivat kuljettaa siitepölyä jopa kilometrejä ja näin pilata kaukanakin sijaitsevan (luomu)viljelijän sadon. Direktiivissä määritellyt suojaetäisyydet ovat täysin riittämättömiä, mutta riittäviä suojaetäisyyksiä (väh. 1 km) olisi mahdotonta toteuttaa jopa Suomessa.

---

### **Translation:**

#### **a. Assessment:**

Molecular characterisation

The structure of GMOs is unstable. This may cause unpleasant surprises to consumers and in this case for example to animals who eat the feed.

#### **b. Food safety Assessment**

##### **Toxicology**

Sugar beet, which is manipulated to resist more pesticides, can also contain more pesticide residues. Not good.

##### **Allergenicity**

Allergic reactions are possible, depending of course on what kind of genes have been transferred into sugar beet.

##### **Nutritional assessment**

It is unlikely that gene manipulation will improve the nutritive value of sugar beet. And even if it would be so, I do not accept its use or cultivation.

## **3. Environmental risk assessment**

If gm-sugar beet would be crossed with other natural plants, they could become so-called super weeds, on which the pesticides have no more effect. GMOs can also have negative influences on soil organisms and food chains.

## **4. Conclusions and recommendations**

As a gardening expert and as a consumer I recommend that gm-sugar beet will not be taken into marketing, cultivation or any use in the area of the EU. Even if sugar beet would not been cultivated here, this kind of introduction is a back door, which makes the resistance to the next gm-organisms more and more difficult. As to gene manipulation the principle of the utmost caution should be observed, otherwise we all will be made guinea pigs, whether we wish or not. Furthermore, in regarding the cultivation of GMOs, once the manipulated genes have escaped from a field, it is practically impossible to catch and destroy them. The gene contamination is therefore permanent, and this may cause serious consequences to the natural biodiversity.

## **5. Others**

However, if it is decided to sell gm-sugar beet, the warnings should be marked with BIG CAPITALS on the products, even if there would be only 0,00001 % the sugar beet in the product or even if there is no sugar beet in the final product (in other words it would have been used only during the manufacturing process). If sugar beet is used as a feed, it should be marked in milk, meat, eggs, wool, skin etc. produced by these animals, that the gm-plants have been used as their feed. Everything else is misleading consumers, hiding information and restricting options.

## **6. Labelling proposal**

I also recommend that the Directives which allow co-existence should not be taken up in the EU. The co-existence of the usual and gm-plants in the fields is out of the question, because the bees can transport the pollen for many kilometres and in this way spoil the (organic)farmer's crop situated faraway. The protection distances specified in the Directive are totally insufficient, but the sufficient protection distances (minimum 1 kilometre) would be impossible to put into practice even in Finland.

## **8. Organisation: University**

### **Country: Sweden**

---

#### **a. Assessment:**

##### **Others**

Any plant genetically modified to be used with a specific chemical (eg Roundup) that is sold/manufactured by a single company, is undermining the future of a free and fair market.

---

### **3. Environmental risk assessment**

1. The impact on ecology in a longer perspective is unknown; still it is common knowledge that any eco-system is a complex system dependent on a variation of species. The introduction of new species into such a system will permanently change it. 2. Roundup is an out-dated, poisonous chemical that is dangerous to both man and animals.

---

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

Until a proper risk-assessment has been made, the survival of specific eco-systems should be considered more important than claims of higher crops/profits. So far the use of GMO:s has in fact resulted in smaller crops and an increased use of pesticides and other chemicals.

## **9. Organisation: Nätverket för EU-kritik**

### **Country: Sweden**

---

#### **a. Assessment:**

#### **3. Environmental risk assessment**

The disregards of the comments from Austrian and Greek authorities seem less convincing this is a text from greecece:

Considering that: 1) the wild relatives of sugar beet originated in Asia Minor, 2) sugar beet is a crosspollinated species, 3) gene flow has been demonstrated between cultivated and wild beets

special precautions should be taken to prevent the dissemination of GM seeds and/or vegetative material with potential to grow into a viable plant. The accidental introduction of GM beet plants into the natural ecosystem where wild beets are grown might disturb the balance of the wild beets population. Therefore, it should be clarified whether seeds or processed sugar and/or syrup will be imported in the Southern EU counties. To this direction the submission of Environmental Monitoring Plan is essential.

and this is the answer:

In a letter to the European Food Safety Authority, dated 14 February 2006, the applicant confirms that the application is for authorization to place on the market food and feed products produced from H7-1 sugar beet.

this seems to me to be a Non-answer of sightly arrogant character, not very convincing

---

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

This is probably not within the panels domains, but nevertheless relevant - please forward comments to inner market regulations

The practice of marketing the combination of a toxic product as Roundup (known for its use in Vietnam war) together with the GMO sugar beet, modified to survive roundup must be an effort to gain market control in away that is hardly acceptable. A natural plant that demands a pesticide from a special company should not be considered a free market praxis.

There is also a paragraph om ethical aspects in the GMO regulation. If this is not an unethical practice, what is?

---

---