

# cotton-MON-88701

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**Organisation: The European GMO-free Citizens (De Gentechvrije Burgers)**

**Country: The Netherlands**

**Type: Others...**

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## **a. Assessment:**

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

Study by Hoechst (Dr Arno Schulz) concerning the substrates of phosphinothricin acetyltransferase (PAT). PAT is present in herbicide-resistant (i.e. PPT-resistant) crops.

Amsterdam, 7 November 1999.

Two studies that arrive at opposite conclusions, namely: 1. Charles J. Thompson, 1987: Characterization of the herbicide-resistance gene bar from *Streptomyces hygroscopicus*; 2. Dr Arno Schulz, 1993: L-Phosphinothricin N-Acetyl-transferase - Biochemical Characterization - a report in Wehrmann 1996 (Schulz is co-author). The subject is the characterisation of the enzyme phosphinothricin acetyltransferase (PAT), and in particular the specificity of the substrates. The first study concerns the reaction of phosphinothricin (PPT) with acetyl co-enzyme A under the influence of PAT and compares this with a number of structural analogues of PPT. One of the analogues is L-glutamate. The products of the reaction were identified via a mass spectrogram and the equilibrium constants (affinity) determined. In addition to PPT, a number of structural analogues were tested to determine whether there was an acetylation reaction. L-glutamic acid was one of the substances investigated. Compared with PPT, the affinity of most of the substances was low; one substance did not react at all. In this test, where a numerically reportable reaction occurred to an identified product (the detection threshold is not an issue here) there does not appear to be any reason to doubt that glutamic acid is a substrate of PAT.

The second study concerns the reaction of a large number of amino acids, including L-glutamic acid, which was also involved in the first study, in a reaction mix together with a 100% excess of PPT in relation to the acetyl source acetyl co-enzyme A and PAT. Products of the reaction were identified using chromatography. Even with a very large excess of L-amino acid no products of reaction with the amino acids were found. Only acetyl phosphinothricin was found. The authors concluded that PAT very specifically has only PPT as a substrate. The following criticisms can be made of this conclusion, which conflicts with that produced in the first study. (Incidentally, the first study is cited in the bibliography to the second study): 1. No detection threshold was determined for acetylated L-glutamic acid. 2. The possibility of acetylated glutamic acid being a source of acetyl for the acetylation of PPT was ignored. This could have been tested in the study by adding acetylated glutamic acid to the reaction mix in a quantity above the detection threshold and examining whether this added quantity disappears during the reaction. Based on the results of the first study it could certainly be predicted to

disappear!! 3. The study was conducted using a reaction mix in which a large excess of a competing substrate, PPT, was present. Observations of the pure amino acids were not conducted. 4. There is no discussion whatsoever of the results of the first study, in particular as to why these were so different. 5. Essentially, the authors of the second study accuse the authors of the first study of fabrication, of fraud (the first study contains a wealth of numerical data; in the second there are no figures). In the second study this aspect is not fully explored. The background to the conclusion that PAT has only one substrate – PTT – is as follows: in herbicide-resistant (i.e. PPT-resistant) crops, PAT is present. In order to obtain approval for products to be placed on the market the toxicity of this gene-product must be examined. Could this gene-product react with the content of our GUT, e.g. with the – important – amino acid L-glutamic acid? It would cost a fortune in research to demonstrate that the dangers were minimal. For HOECHST, it would seem that total denial is a better strategy! We believe that the conclusion drawn in the second study is completely unfounded and that the so-called ‘study’ is unworthy of the name. It is an incompetent study and those persons who cite it need to be told about its incompetence. J. van der Meulen, L. Eijsten.  
<http://www.gentechvrij.nl/rvs9911.html>

EU to restrict herbicide glufosinate

Category: Crop Protection Products. Tags: EU, restrict, herbicide, glufosinate. The European Commission has announced the restrictions for the use of the herbicide glufosinate, which will be effective from Nov 13, 2013.

The decision is based on the additional information provided by the notifier, the Commission considered that the further confirmatory information required had not been provided and that a high risk for mammals and non-target arthropods could not be excluded except by imposing further restrictions.

The active ingredient will only be authorised for band or spot application at rates not exceeding 750 g ai/ha (treated surface) per application, with a maximum of two applications per year.

EU member states must amend or withdraw existing product authorizations in accordance with Regulation (EC) No 1107/2009 by Nov 13, 2013. They may set a grace period of up to one year for use of existing stocks. New approvals should include the application of drift-reducing nozzles and spray shields, together with relevant labelling.

Glufosinate obtained EU approval for use in apple orchards in 2007. Source: EUR-Lex  
<http://news.agropages.com/News/NewsDetail---9598.htm>

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

The Monsanto Company has developed dicamba and glufosinate-tolerant cotton, MON 88701, that will allow in-crop applications of dicamba herbicide for the control of broadleaf weeds from pre-emergence to seven days pre-harvest and glufosinate herbicide for broad spectrum weed control from emergence through early bloom growth stage. MON 88701

contains a demethylase gene from *S. maltophilia* that expresses a dicamba mono-oxygenase (DMO) protein to confer tolerance to dicamba herbicide and a bialaphos resistance (bar) gene from *S. hygroscopicus* that expresses the phosphinothricin N-acetyltransferase (PAT) protein to confer tolerance to glufosinate herbicide.

Glufosinate has long been banned in the EU on account of its high toxicity! But we still get it on our plates, for example via the livestock to which it is fed, or through cotton wool we use on wounds, the cotton buds we use for our ears, sanitary towels, disposable nappies, etc.

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## Allergenicity

Statements by mothers in the USA, where GMOs are not labelled as such.

‘When my son was born he fussed a lot, the whole day, wouldn't nap. I breast fed until he was three months old. And because his gut was not right, he fussed and I could never console him. I tried all the gassy meds, not sure they are considered meds. Once on formula the fussy continued, we switched to different formulas, but not until we switched to parents choice organic, Walmart, his fussy stopped, he began taking naps. As a toddler, I fed him cheerios, a main staple in our house. The tantrums began; two hours at a time couple times a day. This is with head banging or slamming his head into the wall repeatedly. He wouldn't let me hold him, not even touch him. Can you imagine not cuddling your baby? I cried everyday. I had watched the movie Food Inc. It touched on a subject I wasn't familiar with. After watching Genetic Roulette, I cleaned out the cupboards. After doing this, within two weeks my sons tantrums stopped completely, he started smiling, crawling into my lap for cuddles. I had no idea that was the issue. Even now when he gets something conventionally/ GMO poison, he'll have another tantrum like his past. So if there's a question as to where it's from-what kind of seed, I don't take it. So for me and my family, we bow out from being a guinea pig.’ -

Stephanie Vanderyacht

‘My husband was in the hospital 5 times last year. Doctors wanted to remove part of his intestine because it was so infected instead doctors pumped him full of antibiotics for a week when he got out of hospital I changed his diet and all our family food choices to NON-GMO foods WOW what a difference he's doing great and food never tasted so good! I will march sign petitions anything to reclaim our healthy labeled food choices. God Speed JUST SAY NO TO GMO'S ....MAAM!’ Rhonda Bryne, MAA

‘My 7 year old son was diagnosed with asthma and needed glasses inside of two weeks. I started learning about asthma and natural ways to control it. Then I found out about GMO. I removed my family from GMO foods/drinks. My 7 year old went from needing a nebulizer 3x's a day to not at all. His asthma disappeared. He also no longer had the stigmatism that required glasses. The eye Dr. said he must have had ‘some sort of inflammation’ that is now gone for whatever reason. The reason was removing GMO from our diets. He was recommended for retention last year. This year, he is at the top of his class.’ Karen L.~Moms Across America. The above testimonials are a sampling of the hundreds of testimonials which Moms have sent to us. See more:

[http://www.momsacrossamerica.com/zenhoneycutt/mom\\_s\\_testimonials](http://www.momsacrossamerica.com/zenhoneycutt/mom_s_testimonials)

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## Nutritional assessment

No nutritional benefits!

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## Others

Labelling in the Netherlands is a farce. If labelling is carried out, it should be effective and subject to strict supervision, especially in the case of GMOs obtained through parallel importing, which might contain prohibited GMOs, such as certain genetically modified sugars. Dairy products from genetically modified animals and all other uses that are not labelled at present, such as vitamins, enzymes, colourants, flavourings, etc., should also be labelled. The European GMO-free Citizens of Lelystad have found out that:

All American (genetically modified) products at Jumbo are incorrectly labelled. Jumbo places the following warning as standard on all its products from the American range: 'American products may contain genetically modified raw materials', even on the 'GMO Free' products. Consumers are therefore unable to determine whether or not a product contains genetically modified organisms (GMOs). This undermines the basic principles of compulsory labelling of genetically modified food: • consumers have the right to know what they are eating • the freedom of consumers to choose whether or not to consume GMOs. Furthermore, such products may contain ingredients that are prohibited in the EU. This applies to all the American products from the Jumbo range (at least 36 products). Jumbo therefore infringes Dutch legislation concerning compulsory GMO labelling, in particular the Dutch Novel Foods Decree and EU Regulation No 1831/2003. GMOs must be labelled as such in the EU. The wording to be used is specified exactly and must not be deviated from. 5-7-2015 Request to the NVWA (Dutch Food and Consumer Product Safety Authority) to enforce the law at Jumbo. Because this behaviour by Jumbo undermines the principles of freedom of choice and the right of consumers to know what they are eating, we have asked the NVWA to intervene. (more info>>>)

1-9-2015 Ruling by NVWA: Jumbo must change the labelling on all American products. The NVWA immediately started an investigation at the request of the European GMO-free Citizens. Quotation from the NVWA's letter of 1 September 2015: 'Appropriate measures have been taken by the NVWA and the sales organisation to stop the deviation from the rules. The incorrect information was removed from the website, or amended, on 14 August 2015. The said data were also amended on the labels' (full text of the NVWA's letter >>>). All's well that ends well? Unfortunately, Jumbo is still making a mess of things.

This is because in the meantime (2 September 2015), we have noticed the following with regard to the new labels: • products labelled as containing genetically modified wheat. GM wheat is prohibited in the EU; • products labelled as containing GMOs but stated as GMO-Free on the packaging; • products without any labelling (no Dutch declaration list); • we have no confidence in Jumbo actually checking whether the ingredients in these American products really are permitted. After two interventions by the NVWA, Jumbo has still not put its house

in order!! The NVWA had in fact already taken action regarding Jumbo on 9 March 2015, at the request of the European GMO-free Citizens. At the time, around 30 completely unlabelled American GM products were involved. Quotation from NVWA ruling of 9 March 2015: A NVWA inspector took samples for examination. That examination revealed that the labels did not meet the legal requirements. The NVWA took appropriate action (more info>>>).

04-05-2016: The initial products were then finally correctly labelled by Jumbo after repeated requests by the European GMO-free Citizens, a European consumers' platform, to the NVWA. But what will happen if it starts using a different importer? And there are still articles that are incorrectly labelled on the shelves, with no Dutch text on the label stating that the product contains genetically modified (= manipulated) organisms. We are keeping an eye on things! 8 November 2016. Now Poptart labels have been found at Jumbo that are very difficult to read, not just on one kind of packaging, but on several.

[http://www.gentechvrij.nl/DossierJumbo\\_2.html](http://www.gentechvrij.nl/DossierJumbo_2.html)

Via Facebook:

Miep Bos Jumbo Supermarkten 28 February: Dear Jumbo, we have now found yet another US product with incorrect labelling in one of your shops. Does it or does it not contain GMOs? 'Bevat mogelijk GMO' [May contain GMOs] is not permitted under the EU directive.

Jumbo Supermarkten: Hi Miep, that is a good point. And it is not the intention. We will ask our colleagues what the situation is. Can you perhaps also send us a photo of the barcode?  
28 February at 22:04

Jumbo Supermarkten: Hi Miep, We have contacted the supplier and the product has been withdrawn from the range. Thank you for drawing this to our attention. 20 March at 10:14  
[https://www.facebook.com/photo.php?fbid=324595777937632&set=o.156928557716372&type=3&theater-if\\_t=photo\\_comment-if\\_id=1488315874763235](https://www.facebook.com/photo.php?fbid=324595777937632&set=o.156928557716372&type=3&theater-if_t=photo_comment-if_id=1488315874763235) 24 March 2017 Soft drinks Coca Cola Vanilla and A&W and Cheetos (cocktail biscuits, carton) at Jumbo do not bear any indication that they are produced using genetic engineering. Cheetos don't even have a Dutch label. These products are manufactured in the USA and obtained through parallel importing. Jumbo should investigate this.

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

The European GMO-free Citizens, to which I belong, do not want any GMOs on their plates, either as medicine, biological products or vaccine, or as crops.

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## 5. Others

Rising demand for organic and non-GMO grains outpaces U.S. production By Ken Roseboro  
Published: February 22, 2017 Issue: March Category: Organic/Sustainable Farming

Organic imports rise sharply as U.S. corn and soybean growers contemplate premiums, risk-reward scenarios Increasing consumer demand for organic and non-GMO foods led to a sharp rise in organic grain imports in 2016 - prompting food manufacturers to explore new incentives for U.S. growers transitioning to organic production, according to a new report from CoBank. While U.S. production of non-GMO crops has risen, domestic production of organic corn and soybeans remains well short of demand. CUT <http://non-gmoreport.com/articles/rising-demand-organic-non-gmo-grains-outpaces-u-s-production/>

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## 6. Labelling proposal

If you do authorise this - which I would find unacceptable - then label all those clothes made from genetically engineered cotton which go to holes before you know where you are because of the poor quality, so that I can avoid them. And label all the genetically engineered cotton used in healthcare, so that it too can be avoided. In short, everything that is genetically engineered should be labelled as such, so that consumers can avoid it. All statements drawn up by Miep Bos, spokesperson for the European GMO-free Citizens, on behalf of Wieteke van Dort. Lelystad. [www.gentechvrij.nl](http://www.gentechvrij.nl)

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## **Nutritional assessment**

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