

Our objections to GM mustard DMH-11: its very need, benefit claims, safety claims and its testing

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DMH-11 R&D and Testing brings shame to the scientific establishment

- GMO changed midway : Dossier continues to be the same!
- GMO went into BRL stage trials straightaway – no apparent discussions in GEAC when moved from agronomic trials back to a new GMO!
- Trial protocols rigged for favorable results – GEAC decisions on protocols willfully violated – ample scope given to crop developer to fix own protocols – Regulators rubber-stamped
- Trials against poor performing old comparators not used in ICAR system of cultivar evaluation
- Data tweaked and miscalculated at least by 7.5% (higher yield projection with DMH-11) within the compromised protocols!
- “Derived yield” from raw data of trials completely at variance with the good projections being made for DMH-11 yields
- DMH-11 testing completely inadequate – DRMR’s RTI reply reveals that they were only a post-box
- Regulators have no business entertaining an application for “environmental release” or commercial cultivation
- **IMPORTANTLY, NO SCIENTIFIC EVIDENCE THAT DMH-11 OUTYIELDS EXISTING BEST PERFORMING VARIETIES AND HYBRIDS IN INDIA**

ANY BENEFIT ASSESSMENT AT ALL?

- Risk Assessment frameworks are all about assessing realistically and comprehensively both Risks and Benefits, for intelligent decision making.
- Yield claim, and import reduction claim of DMH-11 are both disproven with our evidence (Production and Yield data of Rapeseed Mustard has no evidence to show that entry of hybrids will increase yields and reduce imports)
- There is also evidence from Regulatory CCC field visits and from data from field trials that Male Sterility trait (the technical basis for the hybrid creation in transgenic GM mustard) is breaking down
- We also present evidence on successful alternatives that are safer, affordable (to farmer and government) and ecological

SO, WHY SHOULD DMH-11 OPTION BE CONSIDERED AT ALL, WITH ITS FRAUDULENT CLAIMS?

DMH-11 testing inadequate

In the absence of biosafety dossier in public domain, within the limited information we were able to get, it is clear that:

- No chronic health safety testing
- No feeding trials
- No assessment of impacts on Ayurveda/ISM
- No assessment of impact on honey production
- No proteomics, transcriptomics & metabolomics
- No assessment of impact on organic sector

WHEN YOU SAY INDIA HAS A CASE-BY-CASE APPROACH, HOW CAN YOU HAVE UNIFORM GUIDELINES WHICH FURTHER HAVE WAIVERS OF SOME STUDIES? HOW HAVE YOU ASSESSED GM MUSTARD MORE SPECIFICALLY?

DMH-11 TESTING PROTOCOLS & DATA UNSCIENTIFIC & LAUGHABLE

- Pests
- Diseases
- Beneficial Insects
- Pollen Flow
- Pollination Behaviour
- Aggressiveness & Weediness....

Test protocols unscientific

Observations unbelievable and untenable

Interpretation also consisting of outright lies!

(Since biosafety dossier is not in public domain, we are able to make only limited comments here).

WE CAN'T IMAGINE WHAT IS HIDDEN INSIDE THE FULL DOSSIER AND
CAN IMAGINE WHY IT IS BEING HIDDEN

DMH-11 does not bode well for farmer livelihoods

- Male Sterility trait will spread in Indian mustard – this has implications for yield losses
- Herbicide Tolerance trait will be used by farmers – its own UNASSESSED implications for health and environment

With possibility of F2 seeds being used, herbicide tolerance trait exploited and male sterility increasing, farmers lose on 3 fronts.

INFRINGEMENT ON RIGHTS OF CHOICE

- Farmers who want to remain GM-free cannot do so
- Organic farmers will be particularly affected
- Consumers will have no choices either

NO LIABILITY REGIME IN PLACE

- WHO IS RESPONSIBLE FOR FAILURES & RISKS?
CROP DEVELOPERS? NDDDB & DBT?
GOVERNMENT OF INDIA? REGULATORS?
- UNDER WHICH LAW, AND CLAUSES?
- WHAT IS THE REDRESSAL MECHANISM LEFT
FOR CITIZENS WHO ARE AFFECTED?

CONFLICT OF INTEREST ALL OVER DMH-11

- DBT: SITS IN MEETINGS WHERE IT IS PROPOSED TO ASK FOR FUNDING, ACCEPTS PROPOSALS, FUNDS, APPROVES TESTING AND ALSO JUDGES THE SAFETY
- DR AKSHAY PRADHAN, TEAM MEMBER OF UDSC DMH-11 TEAM IS A GEAC MEMBER
- DR SESIKERAN WHO HEADS RCGM IS ILSI BOARD MEMBER, GEAC MEMBER AND ALSO GOT TO TAKE UP TESTING AFTER PRESCRIBING PROTOCOLS FOR HIMSELF AS THE THEN NIN-DIRECTOR
- DR DEEPAK PENTAL IS HEAD OF DRMR DECISION-MAKING BODIES ON RESEARCH
- A PUBLIC PRIVATE CONSORTIUM CALLED BCIL GETS DBT FUNDS TO PREPARE BIOSAFETY DOSSIER

Why should the nation trust decision-making with such rampant conflict of interest?

Regulators fail the nation badly

- Why should a sub-committee finish its job in 15 days?
- Why did GEAC not ask for raw data?
- Why did GEAC allow DMH-11 to reach this stage when before BRL II trials they are supposed to have appraised biosafety?
- Why did regulators ignore biosafety violations related complaints by civil society as well as their own CCC reports??
- Why did regulators not insist on sharing data in the public domain so that their mandate as regulators is supplemented by independent scientific scrutiny?
- Why do regulators not attend meetings in the first instance and GEAC is allowed to take decisions with just 11-12 members out of a 30+member body?
- Where is representation and participation of Health Ministry and AYUSH Ministry in GEAC?

DATA ON DMH-11 CONTINUES TO BE SHROUDED IN SECRECY

- **DESPITE CIC ORDERS, GEAC HAS NOT PUT OUT BIOSAFETY DOSSIER IN PUBLIC DOMAIN**
- **THIS, INSPITE OF THE FACT THAT GEAC ITSELF TOOK A DECISION ON THIS PRIOR TO THE CIC HEARING & ORDERS!**
- **HIGH TIME THAT ALL DOCUMENTS AND CORRESPONDENCE WITH REGARD TO DMH-11 ARE PUT IN THE PUBLIC DOMAIN – THIS IS AFTER ALL TAXPAYERS' MONEY BEING USED**

OUR DEMANDS TO REGULATORS

- Reject DMH-11 application in toto and immediately
- Fix liability on crop developers for false and incorrect information provided
- Share all information in the public domain
- Accept responsibility for failure to discharge duty

OUR DEMANDS TO THE GOVERNMENT

- SCRAP RCGM AND GEAC
- FIX LIABILITY ON RCGM AND GEAC FOR FAILURE OF DISCHARGE OF DUTY AND RESPONSIBILITY
- STOP THE FUNDING OF UDSC MUSTARD BREEDING PROJECT WITH TAXPAYERS' FUNDS