

To:

September 24, 2016

Shri Anil Madhav Dave
Minister for Environment, Forests & Climate Change
Government of India, New Delhi.

Dear Sir,

Sub: GM Mustard – Call for Independent Scrutiny, Uploading of all Biosafety Data and Extension of Public Feedback time to at least 120 days thereafter.

There have been a great many articles in the press about the proposed clearance of GM mustard, which would be the first genetically modified food crop in India if so cleared. We would like to express our strong concerns about the appraisal and clearance process for India's widely consumed, well-loved and healthy vegetable, spice and oil.

It is surprising that in the age of the internet, all the biosafety data for the 3 GMO mustard lines placed before the GM regulators under your Ministry have not been comprehensively put up for public scrutiny. This is of particular concern since the GM mustard DMH-11 and its parental lines will have the capacity to be herbicide tolerant - as admitted by the applicant in press interviews but not explicitly indicated in his application. Apart from widespread and well-founded skepticism across the world on the lack of claimed benefits and the risks to health, environment and agriculture from GM crops, there is increasing evidence of the serious consequences of herbicides. Herbicide use has increased ten-fold in the 15 years (1995 to 2011) after herbicide tolerant GM crops were introduced in USA. A leading Association of over 30,000 medical professionals in Argentina has pointed to alarming increases in birth defects and cancer after herbicide-tolerant GM soya was introduced there. There are studies linking even low doses of herbicides used with GM crops with diseases such as organ damage and cancer. We must remind you of the safety clearances for tobacco, and the 50 years and thousands of deaths that occurred between the first scientific studies and the official acceptance of the link between tobacco and cancer. We must take the early warnings of risks from GM crops even more seriously, since their consumption in India will be involuntary, almost universal, uncontrollable and irreversible.

The most rigorous scrutiny should therefore be encouraged, rather than prevented, by any Regulator entrusted with the clearance of GM crops. The manner in which partial information has been put up, after the CIC had to instruct this to be done, and the provision of a one month window for people to come to Delhi, after prior appointment, to view thousands of pages of documents and submit their comments, is making a mockery of the process of transparent public review which should be ensured for all GM crop clearance proposals. At least 120 days should be provided for inputs AFTER the full data is disclosed.

Herbicide tolerant crops are particularly dangerous as they result in high levels of toxic residues in food, contamination of drinking water sources and destruction of food for numerous species - including important pollinators like butterflies and bees. Apart from adverse impacts on health and ecology, and the creation of herbicide tolerant super-weeds that have been the despair of farmers in USA, there are major economic implications for India's rural poor. Weed removal is a major source of income for the poorest sections, especially women, and several committees

have said that HT crops, which may be used by the countries whose farms are hundreds of acres in size, are clearly unsuitable for India on socio economic grounds. It makes little sense for governments to first destroy employment through unsuitable technologies, which mostly benefit the pesticide companies, and then relegate rural employment to a few schemes.

From the 2004 Task Force Report on Agricultural Biotechnology, to the 2012 all party and unanimous report of the Parliamentary Standing Committee on Agriculture, to the 2013 Technical Expert Committee Report for the Supreme Court, there have been clear and repeated warnings of the inadvisability of GM crops – except as a last resort if there is an overwhelming need which cannot be met by other and less risk-laden options. No such need assessment seems to have been done, involving all stakeholders. The rights of farmers, consumers and State Governments who wish to be GM free seem to be of no concern in the regulatory process, much less satisfactorily addressed. In terms of supposed benefits of this GM mustard, apparently old, low yielding comparators have been used for the claimed yield increase. The contributions that agricultural technologies other than GM can make to increasing production, without the ill effects of a herbicide tolerant crop, also do not seem to have been investigated. The persuasive propaganda by GM lobbyists that GM is needed to increase yields and that it is safe has been effectively exposed now in numerous studies.

GM crops are both uncontrollable and irreversible and effectively close safe options such as organic farming, for which India has great domestic and export opportunities. Need assessment through transparent public debate is thus an essential step, and an opaque and narrow biosafety assessment only subverts this process. However it is also essential that the existing regulatory lacunae and the present inability to effectively deter regulatory violations are convincingly addressed before clearing any GM crop.

The highest standards of need assessment, independent scrutiny and transparent public participation in making a decision on an important crop like mustard are essential. Doing this by making public all data and allowing at least 120 days THEREAFTER for public responses is a minimal step for a technology that is rejected by the majority of both developed and developing nations. For the present, therefore, the moratorium on GM crops that has been strongly recommended by the Parliamentary Standing Committee and the Technical Expert Committee of the Supreme Court needs to be strictly respected. This should begin with a moratorium on the GM mustard which the GEAC seems to be so eager to introduce with unseemly haste and a worrying lack of transparency.

Sincerely,

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