

File No. C-12017/18/2017-CS-III  
Government of India  
Ministry of Environment, Forest & Climate Change  
CS.III (Biosafety) Division  
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Indira Paryavaran Bhawan,  
2<sup>nd</sup> Floor, Vayu Wing  
Jor Bagh, Aliganj  
New Delhi-110003  
Dated: February 23, 2018

To,

**Shri Jay Karan Singh**

Joint Director General of Foreign Trade  
Directorate General of Foreign Trade  
Ministry of Commerce  
Udyog Bhawan, H-wing  
New Delhi- 110011,  
E-mail: [jaykaran.singh@nic.in](mailto:jaykaran.singh@nic.in)  
Tele No.: 011- 23063249

**Subject: Representation on illegal GM Soybean being imported into India – reg.**

Sir,

This has reference to a representation and complaint received by Genetic Engineering Appraisal Committee (GEAC) regarding illegal/ unauthorized import of GM Soybean into India from countries like USA and Ukraine, where cultivated soybean is mostly GM Soybean (copy of representation enclosed).

2. In this context, it is informed that the Genetic Engineering Appraisal Committee (GEAC), which is the regulatory body for Genetically Modified Organisms (GMOs) and products thereof, has not authorized or approved Genetically Modified (GM) Soybean or any other products derived from GM Soybean seeds for import or cultivation in India.
3. In view of the above, you are requested to consider taking appropriate action, and also issue suitable directives to concerned agencies and officers not to allow import of any GM Soybean (seeds/ grains or products derived from GM Soybean) for use as food/ feed or any other purpose without approval of GEAC.
4. This issues with approval of the Competent Authority.

Yours faithfully,

  
(Dr. Murali Krishna)

Scientist 'D'/ Joint Director  
Telefax: 24695414

Copy to:

1. Dr. S.R. Rao, Senior Adviser, Department of Biotechnology, Block No. 2, 7<sup>th</sup> floor, CGO Complex, Lodi Road, New Delhi - 110 003. Fax-011-24360295 Email: [srrao@dbt.nic.in](mailto:srrao@dbt.nic.in), [rcgm.dbt@nic.in](mailto:rcgm.dbt@nic.in)

2. Dr Anand Kumar Singh, Deputy Director General (Crop Science)/Additional Charge Division of Crop Science, Krishi Bhavan, New Delhi 110001. Phone: (Off.) 91-11-23382545; Fax: 91-11-23097003 E-mail: [ddgcs.icar@nic.in](mailto:ddgcs.icar@nic.in)
3. Shri M. Gunasekaran, Assistant Commissioner (Seeds), Department of Agriculture & Cooperation, Ministry of Agriculture, Krishi Bhawan – 110001, Telefax: 23389241, E-mail: [m.gunasekran@nic.in](mailto:m.gunasekran@nic.in)
4. Dr. B. S. Phogat, Plant Protection Adviser, Old CGO Complex, NH-IV, Faridabad, Haryana- 121001, Phone-0129-2413985, E-mail: [ppa@nic.in](mailto:ppa@nic.in)
5. Shri Ramesh Chander, Director (Coordination), Department of Revenue, North Block, New Delhi- 110001
6. Ms. Kavitha Kuruganti, Coalition for GM-Free India, A-124/6, First Floor, Katwaria Sarai, New Delhi 110016

To:

January 31st 2018

Shri Arun Kumar Mehta,  
The Chairperson,  
Genetic Engineering Appraisal Committee (GEAC),  
Ministry for Environment, Forest & Climate Change,  
Indira Paryavaran Bhawan, Jor Bagh,  
New Delhi - 110001

*Handwritten:* 6/2/18  
Adv (SA)



**Subject: Urgent action demanded on illegal GM soybean (LMOs) being imported into India**

Dear Sir,

*Handwritten notes:*  
Early please  
Sujata  
8/2-18  
JIP (MK)  
Ch. P. Kishore  
ASA (RR) 8/2

Greetings! This is to bring to your attention apparent violations of the EPA 1989 Rules, with regard to GM soybean seeds being illegally imported into India, about which we would like to lodge a complaint, and demand swift action, from the GEAC.

Data available in the public domain shows that some traders in India are importing soybean seeds from countries which grow GM Soyabean for crushing and sowing. Please note that we are talking about Seed, which is a Living Organism, and if transgenic, a Living Modified Organism, which should not have any environmental release in India without adequate testing and clearance from regulators, if found safe.

We have been importing soy seeds from US and Ukraine, for instance. US is known to have mostly GM soyabean (94%) and Ukraine has had its soy exports been reported and cancelled by Russia for having GM contamination. Import of GM soyabean seeds has not been approved in India. The following evidence is what we present to you, to show that LMOs in the form of GM soy seeds are coming into India, with the regulators remaining unaware, or inactive, failing in the discharge of their responsibility.

1) USDA's (US government) reports on export data indicate US exporting soybean seeds to India. The document states that US has exported 500 tons of soyabean to India in 2017-18 and 1200 tons of soyabean in 2016-17.

<https://apps.fas.usda.gov/export-sales/esrd1.html>

2) Another USDA document which states - "In recent years, India imported soybeans from Ethiopia, Benin, Ukraine, the United States, Nigeria, and Djibouti. Imports were mostly for food use and as also partly for seed."

<https://gain.fas.usda.gov/Recent%20GAIN%20Publications/Oilseeds%20and%20Products%20Annual%20New%20Delhi%20India%203-28-2017.pdf>

It is suspected that several consignments from GM soy producing countries are transferred mid-sea, and hence, the source and country of origin are obfuscated as well. Hence, officially stated source of origin of these ships would not be a clear indicator of the products being GM or non-GMO.

Details of imports during last few years as taken from DGFT website are given below -

Financial Year	Import of soyabean as	Import of soyabean as seed
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*Handwritten:* 351/Adv (SA)  
8/2/18

	seed for sowing, having HS Code 12011000 in Tons	for crushing having HS Code 12019000 in Tons
2017-18 (Apr-Oct)	7,407.92	35,498.14
2016-17	1,645.44	79,729.65
2015-16	154.00	20,557.70
2014-15	0.00	6,311.56

This could explain the confirmed illegal cultivation of GM soybean in Gujarat in the recent past (see below) -

<https://www.telegraphindia.com/india/illegal-gm-soy-seized-in-gujarat-184343>

We write to you to demand that GEAC-

- 1) Investigate the import, dissemination and environmental release of illegal LMOs in the form of GM soybean seeds, and take strict action on those flouting the rules.
- 2) Ensure that any soyabean seed imports must be tested at the ports to ensure that they are non-GM in nature.

Yours Sincerely,  
**KAVITHA KURUGANTI**  
Coalition for GM-Free India