

To:

March 6<sup>th</sup> 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

**Subject: Urgent action demanded on illegal GM canola, GM sugar beet, GM papaya, GM soy, GM squash and GM corn seeds (LMOs) being imported into India**

Dear Sir,

Greetings! This is to bring to your attention apparent violations of the EPA 1989 Rules, with regard to GM canola, GM sugar beet, GM papaya, GM soy, GM squash and GM corn 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 papaya, soyabean, sugar beet, canola, squash and corn seeds from countries which grow GM papaya, GM soyabean, GM sugar beet, GM canola and GM corn for sowing respectively. 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.

Data available in the public domain shows that some traders in India are importing seeds from countries which grow GM canola, GM squash, GM sugar beet, GM papaya and GM corn for 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. Further, such an import should comply with the Cartagena Biosafety Protocol, for inter-country movement of Living Modified Organisms.

We have been importing **canola seeds** (HS code 12059000) for sowing from US and Australia, for instance. Of the canola grown in these 2 countries US grows more than **90% GM canola** and Australia grows more than **20% GM canola**. In 2014, more than 1,00,000 kgs of canola seeds for sowing were imported through Nhava Sheva sea port from these countries. Data in public domain also shows that that these canola seeds were imported atleast until 2016 if not beyond.

Similarly we have also been importing **corn seeds** (HS code 10051000) for sowing from US, Chile, Philippines, Argentina and Brazil over the last 19 years going way back to 1999-2000. Argentina and US are known to have more than **90% of their corn as GM corn** whereas Brazil is known to have more than **88% of corn from GM corn**. Spain and Philippines are known be growing more than **35% and 65% of their corn respectively as GM corn** whereas Chile is known to have more than **5% of its corn as genetically modified**. In 2015 and 2016, publically available data shows that we imported corn seeds for sowing from atleast Delhi and Mumbai air cargo respectively.

Also we have also been importing **sugar beet seeds** (HS code 12091000) for sowing from US, for more than 10 years. US is known to have more than **90% of its sugar beet as GM sugar beet**.

We have also been importing **papaya seeds** from China. China is known to grow GM papaya.

We have been importing **squash seeds** from US. US is known to grow GM squash.

GM soy, GM sugar beet, GM canola, GM squash, GM papaya and GM corn seeds have not been approved in India.

The following evidence is what we present to you, to show that LMOs in the form of GM corn, GM sugar beet, GM squash, GM papaya and GM canola seeds are coming into India, with the regulators remaining unaware, or inactive, failing in the discharge of their responsibility.

- 1) Data showing imports of canola, papaya, squash and corn seeds as mentioned above  
<https://www.zauba.com/import-/hs-code-10051000-hs-code.html>  
<https://www.zauba.com/import-canola-seed-sowing-hs-code.html>  
<https://www.zauba.com/import-papaya+seed-hs-code.html>  
<https://www.zauba.com/import-squash+seeds/hs-code-12099190/fp-united%20states/p-1-hs-code.html>
- 2) DGFT's own data shows import of corn seeds, sugar beet from GM corn growing countries, sugar beet seeds from US a GM sugar beet growing country and canola seeds from GM canola growing countries (sample data extract attached here). Data can be found from this link too  
<http://commerce.nic.in/eidb/icomcntq.asp>

This is just another example in the long-standing history of failure of GEAC's regulatory responsibilities. You would remember that this is in addition to our earlier complaint (made in both letter and email) to you (**dated 31<sup>st</sup> January**) on GM soy seeds being imported from countries which predominantly use GM seeds in soybean crop.

We suspect that the Gujarat episode of GM soy being cultivated illegally is related to such illegal import of GM soybean seeds.

It is also suspected that several consignments from GM crop 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 even be a clear indicator of the products being GM or non-GMO.

We write to you to demand that GEAC—

- 1) Investigate the import, dissemination and environmental release of illegal LMOs in the form of GM canola, soy, squash, papaya, sugar beet and corn seeds, and take strict action on those firms and individuals flouting the rules. It is not enough that GEAC writes to the Ministry of Commerce, but GEAC uses the authority it has, to take direct action.
- 2) Ensure that any canola, soy, squash, papaya, sugar beet and corn seed imports must be tested at the ports to ensure that they are non-GM in nature.

Sincerely,

A handwritten signature in black ink that reads "Kavitha". The signature is written in a cursive style with a horizontal line underneath the name.

Kavitha Kuruganti (Contact - 8880067772)

(Address - #302, Santhome Apartments, 33/1, 1<sup>st</sup> A Cross, Indiranagar I Stage, Bengaluru, 560038)

For Coalition for a GM-Free India