



European  
Coordination  
Via Campesina

5 February 2009

Dear Madam/Sir,

RE: UPCOMING VOTES IN FEBRUARY AND MARCH ON:

- GM MAIZE VARIETIES BT11 AND 1507 FOR CULTIVATION
- HUNGARIAN, FRENCH AND GREEK NATIONAL BAN ON MON810 MAIZE

We are writing to you concerning the European Commission's proposals to allow two controversial genetically modified (GM) maize varieties (Bt11 and 1507) to be grown in the European Union, and to force France, Greece and Hungary to drop their national bans on GM maize MON810. In order to safeguard the environment, agronomic diversity and consumers' health we urge you to support these three countries, and to vote against the two GM maize varieties.

On December 4th 2008 the EU Environment Council unanimously concluded that the EU's GMO laws are not implemented properly and the current GMO risk assessment must be improved.<sup>1</sup> In particular, EU Ministers stressed, the need to:

- assess long-term impacts of GM plants and their effects on non-target organisms (Article 3); including a thorough review of the EFSA guidelines to this effect, as previously requested by the European Commission (Article 2 and 3);
- take full account of the specific regional and local characteristics of the Member States (Article 15);
- co-ordinate the assessments of pesticide-producing GM crops (such as Bt11 and 1507) with the assessments of pesticide products (Article 4);
- assess the environmental consequences of changes in the use of herbicides caused by herbicide-tolerant crops (such as Bt11 and 1507 which are tolerant to glufosinate as well as secreting the Bt toxin) (Article 4);
- address the socio-economic impacts of GM cultivation by June 2010 (Article 7).

In September 2008, the Commission's Directorate General for Health and Environment demanded EFSA to assess potential negative environmental consequences of the changes in the use of herbicides caused by herbicide-tolerant GM plants.<sup>2</sup> However, Bt11 and 1507, which produce an insecticidal Bt-toxin and contain a gene making them resistant to the herbicide glufosinate, have never been assessed according to these standards. Moreover, following the recently adopted Regulation on pesticides,<sup>3</sup> the herbicide glufosinate will be banned in the EU.

The Commission's proposals to authorise the cultivation of Bt11 and 1507 disregard all of these recommendations as well as the recently adopted pesticides Regulation. We therefore urge you to vote against this proposal.

The European Commission has put forward the proposal on the two maize varieties under pressure from the company Pioneer, which produces maize 1507. In a deal following legal action by Pioneer,

the Commission decided to act by taking a decision that disregards the scientific controversy around these kinds of GMOs and the concerns about the impact GM crops will have on wildlife and European farming. The decision whether these crops will be grown in the EU now rests with you. We urge you as competent authorities to vote not to grow these controversial crops in Europe.

With regards to the bans in France, Hungary and Greece, it is important to note that the Community re-assessment process for MON810 is currently ongoing. This is to say that it is inappropriate to even consider lifting national bans on this crop at this stage, without waiting for a thorough, independent and good quality review of MON810.

Monsanto maize MON810 has proven adverse effects on non-target organisms (including indirect and long-term effects<sup>4 5 6</sup>) on soil health<sup>7 8 9</sup> and aquatic ecosystems<sup>10 11</sup> and causes insect resistance to the toxin it produces (Bt).<sup>12 13</sup> The genetic sequence inserted into the plant is fused with the plants' own DNA, so MON810 in fact produces an unknown protein. The laboratory tests submitted use the pure version of the Bt toxin, produced by bacteria, and not the one produced by the plant.<sup>14</sup> This invalidates most, if not all, MON810 environmental 'safety' tests. Furthermore, the level of Bt toxin produced by MON810 varies strongly between different locations, over time, and even between plants on the same field.<sup>15</sup>

Your country's citizens reject GM crops and have done so consistently for more than ten years. Almost 60% of the EU population oppose the use of GMOs in agriculture according to the latest Eurobarometer from March 2008.<sup>16</sup> GM proponents present GM crops as inevitable. However, GM crops are only grown on 2.4% of the world's agricultural land and more than 50% of GM crops globally are grown in the US.

In April 2008, the World Bank and several UN bodies concluded the Agricultural Assessment Report signed by 58 governments, the first ever scientific assessment of global agriculture. Compiled over four years by over 400 scientists from around the world, the Assessment sees no role for GM crops in achieving the Millennium Development Goals or in eradicating hunger. The future of agriculture lies in agroecological systems that create jobs and stimulate rural development, defend nature and people by protecting soil, water and climate, and promote biodiversity. Such farming systems ensure healthy farming and healthy food for today and tomorrow, and do not contaminate the environment with chemical inputs or genetic engineering.

We hope that you will consider the elements outlined in this letter and support France, Greece and Hungary as well as vote against the Commission's proposals to authorise the two Bt maize varieties.

Yours sincerely,

**Mauro Albrizio**, Vice President, European Environmental Bureau

**Marco Contiero**, EU Policy Director Sustainable Agriculture and Genetic Engineering, Greenpeace European Unit

**Benedikt Haerlin**, Director, Save Our Seeds

**Helen Holder**, European Coordinator of the GMOs, Food and Farming Campaign, Friends of the Earth Europe

**Rene Louail**, European Coordination Via Campesina

**Marco Schlueter**, Director, IFOAM EU Group

**Rosita Zilli**, Policy Adviser, EuroCoop

## Notes

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- 1** Council Conclusions on Genetically Modified Organisms (GMOs), 2912th Environment Council meeting, Brussels, 4 December 2008 [http://www.consilium.europa.eu/ueDocs/cms\\_Data/docs/pressData/en/envir/104509.pdf](http://www.consilium.europa.eu/ueDocs/cms_Data/docs/pressData/en/envir/104509.pdf)
- 2** Letter of Mr. Madelin and Delbeke of 8 September 2008 to Ms Catherine Geslain-Lanéelle [http://www.efsa.europa.eu/cs/BlobServer/DocumentSet/gmo\\_response\\_european\\_commission\\_en.pdf](http://www.efsa.europa.eu/cs/BlobServer/DocumentSet/gmo_response_european_commission_en.pdf)
- 3** On 13 January 2009 the European Parliament agreed with the Council on the text of the Regulation concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC. The Regulation's criteria identify glufosinate as one of 22 substances that must be phased out in the EU because of the serious health and environmental risks it poses.
- 4** Prasifka, P.L., Hellmich, R.L., Prasifka, J.R. & Lewis, L.C. 2007. Effects of Cry1Ab-expressing corn anthers on the movement of monarch butterfly larvae. *Environmental Entomology* 36: 228-233.
- 5** Andow, D.A. and A. Hilbeck. 2004. Science-based risk assessment for non-target effects of transgenic crops. *Bioscience* 54: 637-649.
- 6** Obrist, L.B., Dutton, A., Romeis, J. & Bigler, F. 2006. Biological activity of Cry1Ab toxin expressed by Bt maize following ingestion by herbivorous arthropods and exposure of the predator *Chrysoperla carnea*. *BioControl* 51: 31-48.
- 7** Baumgarte, S. & Tebbe, C.C. 2005. Field studies on the environmental fate of the Cry1Ab Bt-toxin produced by transgenic maize (MON810) and its effect on bacterial communities in the maize rhizosphere. *Molecular Ecology* 14: 2539–2551.
- 8** Stotzky, G. 2004. Persistence and biological activity in soil of the insecticidal proteins from *Bacillus thuringiensis*, especially from transgenic plants. *Plant and Soil* 266: 77-89.
- 9** Zwahlen, C., Hilbeck, A., Gugerli, P. & Nentwig, W. 2003. Degradation of the Cry1Ab protein within transgenic *Bacillus thuringiensis* corn tissue in the field. *Molecular Ecology* 12: 765-775.
- 10** Rosi-Marshall, E.J., Tank, J.L., Royer, T.V., Whiles, M.R., Evans-White, M., Chambers, C., Griffiths, N.A., Pokelsek, J. & Stephen, M.L. 2007. Toxins in transgenic crop byproducts may affect headwater stream ecosystems. *Proceedings National Academy of Sciences of the USA* 104: 16204–16208.
- 11** Bøhn, T., Primicerio, R., Hessen, D.O. & Traavik, T. 2008. Reduced fitness of *Daphnia magna* fed a Bt-transgenic maize variety. *Archives of Environmental Contamination and Toxicology* DOI 10.1007/s00244-008-9150-5.
- 12** Chilcutt, C.H. and B.E. Tabashnik. 2004. Contamination of refuges by *Bacillus thuringiensis* toxin genes from transgenic maize. *Proceedings of the National Academy of Sciences* 101: 7526-7529.
- 13** Andow, D.A. 2001. Resisting resistance to Bt corn. In: *Genetically engineered organisms: assessing environmental and human health effects*. Letourneau, D.K. and B.E. Burrows (eds.) Boca Raton, FL: CRC Press.
- 14** Rosati, A., Bogani, P., Santarasci, A., Buiatti, M. 2008. Characterisation of 3' transgene insertion site and derived mRNAs in MON810 YieldGard maize. *Plant Molecular Biology* DOI 10.1007/s11103-008-9315-7.
- 15** Nguyen, H. T. & J. A. Jehle 2007. Quantitative analysis of the seasonal and tissue-specific expression of Cry1Ab in transgenic maize MON810. *Journal of Plant Diseases and Protection* 114: 820-87.
- 16** *Special Eurobarometer 295*. Attitudes of European citizens towards the environment. March 2008. Available at URL: [http://ec.europa.eu/public\\_opinion/archives/ebs/ebs\\_295\\_en.pdf](http://ec.europa.eu/public_opinion/archives/ebs/ebs_295_en.pdf)