

From: Farida Akhter

Sent: Thursday, August 15, 2013 8:59 AM

Subject: Fwd: Help stop the commercialisation of Bt Brinjal in Bangladesh

You know Bt Brinjal (GM eggplant) is being in the process of approval for commercial release. We have already filed a Court case against the approval application. The court has asked to submit the health impact by September 19th. In the meantime, we are organising national and international signature campaign to stop the approval process by requesting the Prime Minister to intervene the approval process.

I have requested various groups internationally to sign the letter drafted below or to write a letter on their own. Please also help circulate the letter to the groups you know.

You can either sign this letter or write a letter on your own. Already various groups in India and other countries have started signing.

Regards,

Farida

To;

Sheikh Hasina

The Prime Minister

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Prime Minister's Office

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cc: 1. Begum Matia Chowdhury

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Honourable Prime Minister,

We are deeply concerned knowing through a newspaper report that Bangladesh Agricultural research Institution (BARI), the government-run agricultural research organisation, wants to release four genetically modified eggplants. These are indigenous varieties of Bangladesh engineered by controversial manipulation of eggplants injecting genes from the bacterium bacillus thuringensis. Media reports that sometime in mid- June 2013, BARI applied for approval from the Ministry of Agriculture (MoA) to release BARI-developed four varieties of BT-brinjal at the farmers' level. Nine indigenous varieties have been injected with BT-gene of which BARI sought for releasing four varieties whose indigenous names are Uttara, (Rangpur) Kajla and Khatkhotia of Jessore and Douhajari of Chittagong. [Please see BARI for release of GMO variety: Experts fear of risk of liver damage, immunity failure, by Yasir Wardad, The Financial Express, 26 June, 2013].

Media also reports that the Bangladesh Agricultural Research Institute (BARI) submitted application to the National Technical Committee for Crop Biotechnology (NTCCB) in mid July 2013 for the release of Bt brinjal in August, 2013. [please see Daily Star July 11 2013. Brinjal modified: Bangladesh set to join elusive club of 28 GM crop growing countries].

Given our knowledge and expertise in this area, we think the decision to approve Bt Brinjal may turn out to be disastrous for the agriculture and the food systems as well as health of the people of Bangladesh.

GMOs are potential threat to environment, ecology and biodiversity. Since it has been banned in Philippines and a moratorium for indefinite period has been imposed in India, it makes no sense to introduce Bt brinjal in Bangladesh. I would strongly urge you to immediately intervene in the approval process and make your decision on the basis of the wealth of independent scientific research and facts that demonstrated clearly the following:

1. Bt brinjal has no agronomic value, adds nothing to the quality, taste and nutritional value of the product. Bangladesh belongs to the region of diversity of eggplants to address the food and nutritional needs of the people.
2. The only justification of Bt. Brinjal is to reduce excessive use of pesticide and crop damage is not based on evidence in Bangladesh. There are well known practice by which farmers are quite capable to manage the fruit and stem borer (FSB) by avoiding monoculture, using the healthy local seed and practicing mixed crop and crop rotation. Except FSB Bt brinjal can protect egg plants from pests and fungus.
3. Environmental and ecological risks are very high since there are risks for irreversible biological pollution.
4. Farmers will lose their seeds and the country will become dependent on the foreign company creating social and political dependence. Once a foreign company control a seed market of any single food plant, seed for more GE plants will follow, and the Company will destroy and replace farmer's seed system. This can be disastrous for an agrarian country like Bangladesh.
5. Bangladesh may lose the expanding market for organic food, since GMO has the potential to pollute other crops.
6. Bt brinjal expressing Bt protein poses a serious health risks to those who consume it.

7. Given the resistance of the European and North American consumers against the consumption of GMO products and the failure to introduce Bt brinjal in Philippines and India, it seems farmers and consumers of Bt. Brinjal may become the 'guinea pigs' for global GM crops experimentation..

8. There is no effective GM labelling in Bangladesh, that would allow people to avoid eating Bt Brinjal. This also means that there can be no traceability if any health effects of Bt Brinjal emerge.

9. There is no liability regime that would ensure that anybody adversely affected would be compensated.

Who is going to accept liability if anything ever goes wrong?

It is alarming that at present there is no law on biodiversity or biosafety in Bangladesh and no legally constituted authority to regulate trade, production and distribution of GMOs. It is only based on the National Biosafety Rules, 2012 which is not enough to protect against the risks of introduction of GMOs in the country.

Role of a technical committee such as NTCCB is best served if they are able to establish and monitor the strict professional and ethical standard of scientific research, particularly related to the high risk involved in genetic manipulation of life forms and more so in a country like Bangladesh rich in Biodiversity. There is an obvious need to setting up strict professional and ethical principles and guidelines for research in molecular biology and genetic engineering. However the NTCCB cannot have any authority to approve a GMO crop for commercial release, neither do they have any expertise in environmental and ecological assessment of potential hazard of GMOs for agriculture. They also have no capacity in epidemiological research to ascertain the potential health hazards. It is important to note that the committee is not stipulated by law to protect environment, ecology and safety of the life forms including human beings.

Economic and social assessments are other crucial and critical areas before government should decide to introduce GMO in Bangladesh. In short commercialisation of GMOs is not at all a technical scientific issue and could be decided at the scientific level. There is absolutely no reason for the Government to rush on Bt. Brinjal for approval for commercial release particularly when the research findings are incomplete and not yet available for review and scrutiny.

Bangladesh is a 'target' country for the Bt. Brinjal under the ABSP II and the 'Monsanto technology' - a joint venture with Maharashtra Hybrid Seed Company (MAHYCO) of India and its collaboration with the private seed company East West Seeds, Bangladesh. MAHYCO is transferring the technology and basic breeding material of Bt. Brinjal to two Indian public sector institutions (PSIs), the Tamil Nadu Agricultural University, Coimbatore (TNAU) and the University of Agricultural Sciences, Dharwad (UASD), though the ownership of the GE event EE-1 still rests with MAHYCO. The Bt. Brinjal contains a gene construct of Cry 1 Ac from Monsanto, the American multinational corporation, which has a 26 per cent stake in MAHYCO-Monsanto Biotech (MMB). The public sector institutions in India and Bangladesh will use the MAHYCO material to backcross with their own brinjal varieties to incorporate the genetic event into them so that the plant become poisonous to the fruit and stem borers.

Bangladesh does not have law and legally stipulated regulatory authorities to adequately safeguard ecology, biodiversity and human health. In the absence of laws and regulatory regimes for biodiversity and biosafety of GM crops and food the decision of introducing genetically modified eggplants depends on the whim of the Government. The prerogative to safeguard the interest and safety of the citizens in the areas of agriculture, medicine, food, import, trade, and environment related to biotechnology and genetic engineering lies with the executive organ of the state. After NTCCB, the second decision making body, the National Executive Committee on Biotechnology of Bangladesh (NECBB) is also functioning under the Principal Secretary to the Prime Minister.

Five National Technical Committees (NTC) on Biodiversity, Biosafety, Plant Biotechnology, Animal and Fisheries Biotechnology and Medical Biotechnology are also operating under the secretaries of the respective ministries. The Task Force approved all guidelines and policies developed by the concerned ministries and NTCs in 2006, during the military backed Care-Taker Government.

Lack of law and legally stipulated regulatory authority on GMOs notwithstanding, it is the responsibility of the state to protect the citizens from harmful activities of any person, organization and agency that can threaten health, life, environment, ecology or the lifestyles and the associated livelihood and knowledge practices of local and farming communities. These are natural rights and they not only predates the formation of the state but also constitutes the state's binding obligations to the international community stipulated through signing international covenants such as Ramsar Convention, Convention on Biological Diversity, Cartagena Protocol on Biosafety and various other covenants related to human rights.

We are sure that you are aware of the status of Bt Brinjal trial in India, which has an indefinite moratorium and in Philippines the Supreme Court has issued restraint on field trials of Bt Talon (Talon in Philippines means brinjal) on ground of right of citizens to a balanced and healthful ecology. Now it is only Bangladesh which is now getting ready for approval of Bt Brinjal for release at farmers level. We see absolutely no reason for Bangladesh to go ahead so swiftly with the approval of Bt Brinjal making the entire approval process controversial. Bangladesh has not yet passed Biosafety regulation Act as required by Cartagena Protocol on Biosafety and therefore it will raise serious reactions at the international level as the consequences are very disastrous.

We are willing to have an interaction with the scientific community as well as farmers and environmental groups to discuss the matter further and till then we request you to kindly intervene immediately and stop the approval process till the research on health, environment and biodiversity is proved safe.

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