



ЕВРОПЕЙСКИ ПАРЛАМЕНТ PARLAMENTO EUROPEO EVROPSKÝ PARLAMENT EUROPA-PARLAMENTET
EUROPÄISCHES PARLAMENT EUROOPA PARLAMENT ΕΥΡΩΠΑΪΚΟ ΚΟΙΝΟΒΟΥΛΙΟ EUROPEAN PARLIAMENT
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EURÓPSKY PARLAMENT EVROPSKI PARLAMENT EUROOPAN PARLAMENTTI EUROPAPARLAMENTET

The Greens/EFA
Rue Wiertz 60, ASP 8H255
B-1047 Brussels

Commissioner Tonio Borg
BRU-BERL 11/101

Open letter

Brussels, 5 July 2013

Dear Commissioner Borg,

We have been informed that the Commission has convened an Appeal Committee on 11 July 2013 to discuss and vote on proposals for the market authorisation of genetically modified maize SmartStax, eight segregants and the stacked event Powercore. The Member States are asked to vote on the introduction of these crops on the market for food and feed.

We urgently ask you to withdraw the proposals of the Commission and not to hold a meeting of the Appeal Committee on the authorisation on GM maize. We think that the risk assessment of these products has been insufficient and that EFSA's positive assessment is unjustified for the following reasons:

The SmartStax maize includes six different insecticidal toxins (Bt-toxins), which are combined in a new formulation and which is additionally resistant to two herbicides. In contrast to naturally occurring toxins, the Bt-toxins of SmartStax are modified in their structure. One of the Bt-toxins was produced synthetically (Cry1A105) and has different characteristics as compared with naturally occurring Bt-toxins.

We consider the EFSA risk assessment as insufficient. EFSA did not analyse in an adequate way the interaction between the modified genes, the new proteins and residues from spraying to which it is resistant. Only a 42 day nutritional feeding study on poultry to analyse their growth rate has been undertaken, but no studies have been undertaken to investigate on the potential health impact. In the case of Powercore the nutritional feeding study was even completely flawed, as EFSA wrote in its opinion. Other studies that showed immune reactions in animals feed with GM maize have not been taken into account.

EFSA also ignored the fact that the level of toxic proteins in SmartStax can vary significantly, and can add up to very high values. According to the industry, it can add up to 1600 mg/kg in leaves. Indeed this data may even not be reliable, since no validated test methods were used to determine the range of Bt-toxins. Furthermore under changing climate conditions, the content of Bt-toxins can vary as well. But the reactions of the plants to climate conditions were not tested systematically.



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We are also concerned about the fact that there was no investigation into the persistence of the artificial Bt-toxins. Therefore, the actual exposure of the environment via manure or parts of the plants and the potential accumulation of the toxins in the soil cannot be assessed.

Furthermore specific methods for the detection of SmartStax, its segregants and of Powercore are not available – thus the traceability required by EU regulations is not ensured.

We also think that the application to allow GM maize MON810 in pollen and honey should not be considered while the renewal of the application for commercial growing of MON810 is still under consideration and 8 countries have refused to authorise its cultivation.

In our opinion the research on the above mentioned GM crops is dangerously insufficient and an approval for the market is an infringement on the precautionary principle under the given circumstances. Under these circumstances the Commission cannot exclude risks for the human health and the environment and should therefore stop the approval process.

Yours sincerely,

Martin Häusling

Bart Staes

José Bové

Rebecca Harms