

To:

September 22nd, 2016

Shri Anil Madhav Dave
Minister for Environment, Forests & Climate Change
Government of India.

Dear Sir,

Sub: Our NO to GM Mustard and other Genetically Modified Foods – Public feedback time on GM mustard on the verge of commercial cultivation permission to be extended urgently to 120 days – all biosafety data to be shared for independent scrutiny – reg.

Namaste! We are alarmed at the biosafety clearance that 3 GMOs of mustard have received from the Indian regulators for gene technology, under your Ministry. It is apparent from even a preliminary perusal of the matter that neither benefit assessment nor risk assessment has been taken up comprehensively and thoroughly by the regulators.

It is worth noting that all the 3 are herbicide tolerant GMOs, even though the application makes it appear as though herbicide tolerant genes only had a "marker" function. The crop applicant has recently accepted that the GM mustard in question is indeed herbicide tolerant. However, proof of the intention of the crop developer to gain a backdoor entry for Herbicide Tolerant crops has already been presented to the regulators. The adverse impacts of herbicide tolerant crops including greater agri-chemical usage, more chemical residues in our food and environment, adverse impacts of both the GM crop and the linked chemical usage on our health and environment, entrapping of farmers in a seed and chemicals market trap, creation of super-weeds etc., are all well documented. Importantly, in a socio-economic-cultural context where millions of women in India find employment in manual de-weeding, displacing them from existing employment opportunities has huge implications for livelihoods of the poorest in India. Several credible committees have recommended strongly and clearly against HT crops in India.

Right from the beginning, we have been saying that this application should not have been accepted or processed by our regulators at all.

There are several other issues too, including the fact that yield increase claims are unfounded, and that there are various ways and means by which India's oilseeds production can be increased without resorting to transgenic technology. In fact, the release of (even non-transgenic) hybrids has not resulted in any yield or production increases of mustard as evidence shows.

Meanwhile, after a special meeting convened by GEAC to listen to citizens' representatives (scientists, farmers' leaders, consumer activists), it became clearer that the regulatory body is limiting itself to only narrow biosafety assessment that too in an unscientific and incomplete manner. Even Risk Assessment is not comprehensive and thorough.

However, there are numerous issues of concern that remain totally unresolved with this kind of regulation – what about the rights of a farmer who wishes to remain GM-Free but finds her/his crop contaminated by neighboring GM crop? What about the rights of consumers who wish to

know what is in their food, have a right to informed choices and have a right to safe food? Will a labeling regime ever work in a country where most consumption is not of packaged commodities, but open? Can citizens draw any faith on such regimes when even the existing GM labeling regime for packaged commodities is a sham in the absence of its implementation? Where is a well worked out liability regime in India to address issues of penalties, redressal and remediation when things go wrong with this risky technology? Why is it that the government is ready to dabble with a hazardous unneeded technology when there are other solutions that exist which are farmer-controlled, safe, sustainable and affordable? What about natural/organic farming and the fact that transgenics and organics are incompatible in numerous ways, including by way of regulation? How about the fact that most state governments do not want to opt for transgenic technology in our food, farming and environment? It is clear that your Ministry or the regulatory body have no answers. In which case, there should be no processing of applications in the first instance. Without a proper biosafety policy in place, why is the Government/Ministry moving ahead in haste? There is also the Supreme Court PIL on the matter which is yet to hear the Court pass its Orders.

At this point of time, we write to you to communicate our rejection of transgenics in our food, farming and environment and to urge you to stop your regulators from providing any regulatory clearances to GMOs and their environmental release. This applies to the current case of GM mustard in particular (all the 3 GMOs) but also all GM foods.

Meanwhile, we are also alarmed at the non-scientific, opaque and deceptive processes being adopted by the regulators in the name of collecting public feedback on GM mustard. As you might be kindly aware, 30 days of public feedback time has been given, without placing the biosafety dossier in the public domain. There are also restrictions on how such feedback is to be given! A lot of civil society evidence already exists, contrasting these hasty processes with precedents in the past, and how what is underway right now is unacceptable. **We urge you to extend the public feedback time to 120 days, to get the regulators to put out the full biosafety dossier in the public domain for independent scientific scrutiny as has been done with other GMOs in the past, and make sure that feedback is collected in all forms without any prescribed formats etc.** Further, GoI also has to make sure that state governments are consulted on this important matter. Thanking you,

Sincerely,



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Copy: To Shri Narendra Modi ji, Prime Minister, Government of India

Sd/-by:

1. Achutha Ramarao, State Secretary, All India Kisan Mazdoor Sabha
2. Adm. (Retd) L. Ramdas, Maharashtra
3. Amiya Pattnaik, President, Congress Farmers' Cell, Odisha
4. Anil Trivedi, Advocate and social activist, Madhya Pradesh

5. Arun Dike, Organic Farming activist, Madhya Pradesh
6. Aruna Rodrigues, Lead Petitioner in the Supreme Court PIL on GMOs, Madhya Pradesh
7. Aruna Roy, Shankar Singh & Nikhil Dey, Mazdoor Kisan Shakti Sanghatan, Rajasthan
8. Ashish Kothari, Kalpavriksh, Pune
9. Ashok Mathur, Sanjha Manch, Rajasthan
10. Bhagirath Mal, State Convener, Swadeshi Jagran Manch, Rajasthan
11. Bhagwan Dhadich, Kisan Sewa Samiti Maha Sangh, Rajasthan
12. Chogalal, BKS, Rajasthan
13. Dr A Biju Kumar, Associate Professor and Head, Dept of Aquatic Biology and Fisheries, University of Kerala, Thiruvananthapuram
14. Dr A Gopalakrishnan, Former Chair, Atomic Energy Regulatory Board of GoI
15. Dr A R Vasavi, Anthropologist, Expert on Agrarian Issues, Author, Infosys Awardee, Karnataka
16. Dr Amar KJR Nayak, Professor of Strategic Management, XIMB
17. Dr Amar Singh Azad, Center for Environmental Health, Patiala
18. Dr Anbumani Ramadoss, former Union Health Minister
19. Dr Balaram Sahu, Registrar, Odisha Veterinary Council
20. Dr Biswajit Mohanty, Wildlife Society of India, Odisha
21. Dr C T S Nair, Former Chief Economist (Forestry Dept), Food & Agriculture Organisation (FAO) and Former Exec. Vice President, Kerala State Science Technology & Environment Council, Kerala
22. Dr Claude Alvares, Director – The Goa Foundation and Founder, Organic Farming Association of India, Goa
23. Dr D Nandakumar, Senior Advisor, Climate Change and Environment, Inter Cooperation Social Development, India
24. Dr Daljit Singh, Professor Emeritus, Amritsar
25. Dr Debal Deb, Ecologist & Member, NBA's AgroDiversity Committee
26. Dr Devinder Sharma, Kisan Ekta, Chandigarh
27. Dr G P I Singh, Vice Chancellor, Adesh University, Bathinda
28. Dr G V Ramanjaneyulu, Centre for Sustainable Agriculture, Hyderabad
29. Dr Imrana Qadeer, Visiting Professor, Council for Social Development, Delhi
30. Dr J Devika, Development Studies professional, Author & Translator, Kerala
31. Dr Jagatbandhu Mohapatra, Ayurveda expert, Odisha
32. Dr Jeevanantham, President, TN Green Movement, Tamil Nadu
33. Dr K G Thara, Member, Kerala State Disaster Management Authority, Govt of Kerala
34. Dr K Ramasamy, Vice Chancellor of an Agriculture University, Tamil Nadu
35. Dr Mahabir Narwal, Retd. Sr Plant Breeder, CCSH Agriculture University, Hisar
36. Dr Minubhai Parabha, Former Head, Bio-Sciences Dept., South Gujarat University & Member, Gujarat State Biodiversity Board
37. Dr Mira Shiva, Public Health expert, Delhi
38. Dr Mohan Rao, Community Health expert, Delhi
39. Dr Pratiba Kumari Nanda, Former Reader in Botany, Odisha
40. Dr Pushpa Amarnath, Former President, Jilla Panchayat, Mysore
41. Dr R R Fuliya, I.A.S., Addl. Chief Secretary, Govt of Haryana (Retd)
42. Dr R S Dahiya, Retd. Senior Professor, PGIMS Rohtak; Ex Vigilance Officer, Medical Education, Haryana
43. Dr R S Ghumman, CRRID, Chandigarh
44. Dr Rajneesh Arora, Former Vice Chancellor, Punjab Technical University, Punjab

45. Dr Rathindra Nath Basu, Former Vice Chancellor, Kolkata University and former Chair, State Agriculture Commission, West Bengal
46. Dr Ritu Priya, Social Medicine and Community Health Expert, Delhi
47. Dr Sailabala Padhi, Former Prof. of Botany & Director, Centre for Environmental Studies,
48. Dr Sivaraman, Siddha Expert, Tamil Nadu
49. Dr Suman Sahai, Gene Campaign, Delhi
50. Dr Sundara Narayana Patro, President, Odisha Environmental Society
51. Dr Sunilam, Kisan Sangharsh Samiti, Madhya Pradesh
52. Dr T K Bose, former Member, State Agriculture Commission, West Bengal
53. Dr T S Channesh, Dean, GPS Institute of Agricultural Management, Bengaluru
54. Dr Tushar Chakraborty, Geneticist & Science Communicator, West Bengal
55. Dr V S Vijayan, Chairperson, Salim Ali Foundation; Former Chair, Kerala State Biodiversity Board; Founder Director, Salim Ali Centre for Ornithology & Natural Studies (SACON, a Centre of Excellence of Government of India)
56. Dr Vandana Shiva, Navdanya, Delhi
57. Dr Veena Shatrughna, Deputy Director (Retd), National Institute of Nutrition, Hyderabad
58. Kaveri Dhanapalan, General Secretary, Kaveri Vyavasayigal Paadugapu Sangam
59. Kavita Srivastava and Dipa Sinha, Right to Food Campaign
60. Kishore, Actor, Bengaluru
61. Kodand Reddy, Kisan Khet Mazdoor Congress, Telangana State President
62. Lalita Ramdas, Maharashtra
63. Lingaraj Pradhan, Ashok Pradhan & Saroj Mohanty, Paschim Odisha Krushak Sangthana Samanwya Samiti, Odisha
64. Maganbhai Patel, President, Bharatiya Kisan Sangh, Gujarat
65. Mahaveer Shastri, President, Bhartiya Kisan Sangh, Rajasthan
66. Manju Dixit, Women Convener, BKS, Rajasthan
67. Medha Patkar, National Alliance for People's Movements
68. Mohini Mohan Mishra, Secretary, Bhartiya Kisan Sangh, New Delhi
69. Nagesh Hegde, Senior Journalist and Rajyotsava awardee, Bengaluru
70. Natabara Sarangi, well known Organic Farmer & Agrodiversity Conserver
71. Nathulal Meena, Retired Agriculture Scientist, Rajasthan
72. Nava Nirman Krushak Samiti, Odisha
73. Padma Shri B Sugathakumari, Poet, Environmentalist, Kerala
74. Padma Shri G Sankar, Director, Habitat Technology Group, Kerala
75. Padma Shri Janak Palta, Madhya Pradesh
76. Padma Shri TG Kutty Menon, Madhya Pradesh
77. Prashant Bhushan, Senior SC Advocate, Delhi
78. Prof A Prasada Rao, Retd. Professor (Soil Sciences), ANGRAU
79. Prof B N Reddy, Retd. Professor (Botany), Osmania University and former President, Jana Vigyana Vedika
80. Prof E Revathi, Professor, Centre for Economic and Social Studies
81. Prof K R Chowdry, Retd. Professor, Acharya NG Ranga Agricultural University and Member of Commission on Farmers' Welfare of A.P. Government (2004)
82. Prof M Adinarayana, Retd. Professor (Chemistry), Osmania University
83. Prof Rajinder Chaudhary, Former Professor of Economics, Rohtak, Haryana
84. Prof Sudarshan Iyengar, former Vice Chancellor, Gujarat Vidyapeeth, Gujarat
85. Prof Sultan Ahmed Ismail, Eco Science Research & Foundation, Chennai
86. Prof. (Retd) Radhamohan, Former State Information Commissioner, Odisha

87. Rakesh Tikait, Bharatiya Kisan Union, Uttar Pradesh
88. Rohini, Actress, Tamil Nadu
89. Rushikalya Ryot Mahasabha, Odisha
90. S Malla Reddy, All India Kisan Sabha, National Vice President
91. S Ramakrishnan, Historian and Writer, Tamil Nadu
92. Shalini Bhutani, Legal researcher and analyst, Delhi
93. Sudhir Pattnaik, Writer and Journalist, Odisha
94. Vadde Sobhanadreeswara Rao, Former Agriculture Minister, Andhra Pradesh
95. Vellaiyan, President, Tamil Nadu Traders' Association, Tamil Nadu
96. Vinit Singh, Honey Exporters Association of India
97. Yudhvir Singh, Indian Coordination Committee of Farmers' Movements, Delhi