

EU Commissioner  
Mr Vytenis Andriukaitis,  
European Commission  
Directorate General for Health and Food Safety  
B - 1049 Brussels  
Belgium

Open letter

16 November 2015

Dear Mr Andriukaitis

*Stop the authorisation of further genetically engineered herbicide resistant soybeans for import*

The Standing Committee on Plants, Animals, Food and Feed has three genetically engineered soybeans with resistance to glyphosate on its agenda for 18 November for import and usage in food & feed:

- MON87708 x MON89788 (resistance to glyphosate and dicamba)
- FG72 (resistance to glyphosate and isoxaflutole)
- MON87705 x MON89788 (double resistance to glyphosate and change in oil content)

**We are asking you to stop the authorisation of these genetically engineered soybeans for the following reasons:**

As EFSA states in its recent conclusion on the risk assessment of glyphosate, “residue trials on glyphosate tolerant GM crops were not provided”. This is the reason why EFSA risk assessment on health effects is “limited to conventional crops only”. Further, EFSA states that additives such as POE-tallow amine, which are used in many commercial formulations together with glyphosate, are more toxic than glyphosate. EFSA, in fact, itself concludes that more investigations are needed in this context on health risks such as carcinogenicity. As EFSA also states, there are also no data available on the actual load of residues from these additives in the plants. It has to be expected that the genetically engineered soybeans have been sprayed with various formulations in countries such as Argentina, Brazil and the US, and some of these formulations are unlikely to have been approved in the EU. Since EFSA could not deliver a conclusive risk assessment on the actual risks of these residues from spraying with glyphosate and various glyphosate formulations, the precautionary principle must be applied and authorisation of further genetically engineered plants with resistance to glyphosate suspended.

It is only since MON87708 x MON89788 and FG72 were introduced into the market that herbicides such as isoxaflutole and dicamba in combination with glyphosate can be applied directly to soybeans. Spraying with isoxaflutole and dicamba results in residues that are assumed to impact

human health. Some of the risks that have been identified are similar to those found for glyphosate (same endpoints). The residues from the usage of isoxaflutole are considered to be probably carcinogenic. The combinatorial effects on health from the mixture of residues might be much more severe than can be expected from the assessment of the single components. However, EFSA did not assess these combinatorial effects and, consequently, these plants cannot be authorised.

At the end of May 2015, GeneWatch UK and Testbiotech together filed a request at the EU Commission for an internal review of the authorisation for three genetically engineered soybeans. This request also concerns MON87705, which was used for the production of one of the stacked events under discussion. Even though all the legally defined deadlines have passed there has been no response from the EU Commission. The request draws attention to the fact that risk assessment of GM crops with significantly altered nutritional content such as MON87705, need a specific guidance. Since no such guidance is available, the soybean MON87705, alone or as a stacked event, cannot be allowed for import.

With kind regards



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Annex: Technical backgrounder