

**Dr. Kalyan B. Goswami**  
Executive Director



Ref. NSAI/2016/91

Date: 23.07.16

Dr. Amita Prasad  
Chairperson  
Genetic Engineering Appraisal Committee (GEAC)  
Ministry of Environment & Forests  
Government of India  
New Delhi

**Respected Madam,**

**Sub: The Biosafety approval of GM Mustard - Regarding.**

- Ref: 1. **INSIA letter to Hon'ble Minister of Environment and Forests dated 22.01.04**  
2. **Our letter addressed to Chairperson, GEAC dated 07.12.2015**  
3. **Our letter to Hon'ble Minister of Environment and Forests dated 14.04.16**  
4. **Our letter to Dr. Ranjani Warriar, Advisor, MoEF, dated 25.05.2016**  
5. **Our letter addressed to Chairperson, GEAC dated 21.06.16**

In continuation to the references above, we wish to communicate our Association views in the matter of approval of GM trait in Mustard, which is now being deliberated by GEAC for approval. The National Seed Association of India is in favor of new GM traits in all the crops after due process of biosafety evaluation. We believe availability of new GM traits will enhance the yield potential of the hybrid / variety thereby enhancing crop productivity.

In the references, cited above, we had brought to your kind notice that GEAC need not stipulate submission of NOC for the approval of new cotton hybrids carrying biosafety approved Bt cotton GM traits. There is no provision in the Rules, 1989 or the EPA 1986 for such stipulation of NOC. This is only leading to monopoly.

The GM Mustard trait, now under consideration for approval by GEAC, is a trait for inducing male sterility in Mustard, which ultimately helps in developing new hybrids thereby allowing the breeders to exploit heterosis which contributes for higher yield. If this trait is approved by GEAC, after the biosafety evaluation, there shall not be requirement for the breeders to come for new hybrid approval as and when they develop new hybrids using the male sterility developed through incorporation of this trait. As explained earlier, the transgenic varieties are protected for the intellectual property rights under PPVFR Act and the developer of such GM traits is entitled for claiming trait value under Section 26 of the PPVFR Act. GEAC which essentially functions to ensure biosafety need not have to stipulate for NOC as all breeders who use such a trait need to pay trait value as decided by PPVFR.

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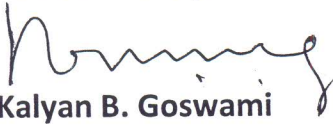
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We thought, it is appropriate to mention through this letter the Industry Association's support to release of new GM traits and also to bring to your kind notice the need for removing stipulation of NOC which are leading to monopoly and thereby exploitation of the farmers through charging of high trait value on seeds. The PPVFR Authority is empowered under Section 26 read with rule 40 to 44 of the PPV&FR Rules, 2003 to decide the trait value which the developer is entitled to claim.

We shall be grateful for your favorable action in the matter.

Thanking you,

Yours sincerely,

  
**Kalyan B. Goswami**

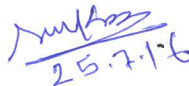
सचिव (डेयर) एवं प.नि. (भा.क.अनु.प.) का कार्यालय  
Secy (DARE) & DG (ICAR)'s Office

**Copies:-** डायरी सं. / Dy. No.....R.....  
दिनांक/Date.....

1. Dr. Trilochan Mohapatra, Director General, Indian Council for Agricultural Research, Krishi Bhavan, New Delhi.
2. Shri Anurag Jain, Joint Secretary to PM, Prime Minister's Office, New Delhi.
3. Shri Rajesh Kumar Singh, Joint Secretary (Seeds), Dept. of Agriculture, Cooperation and Farmers Welfare, Govt. of India, Krishi Bhawan, New Delhi.
4. Dr. Jeet Singh Sandhu, Deputy Director General (Crop Science), Division of Crop Science, Krishi Bhavan, New Delhi 110 001.
5. Dr. S R Rao, Member Secretary, RCGM Secretariat, Dept. of Biotechnology, New Delhi
6. Smt. Madhumita Biswas, Member Secretary, GEAC, Indira Paryavaran Bhavan, New Delhi



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25.7.16