

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



Ref. NSAI/2017/0130

To  
The Chairperson  
Genetic Engineering Appraisal Committee (GEAC)  
Ministry of Environment, Forests & Climate Change  
Indira Paryavaran Bhawan,  
Aliganj Road, Jorbagh,  
New Delhi - 110 003

To  
The Chairman  
Review Committee on Genetic Manipulation (RCGM)  
Block 2, 8 th Floor,  
Department of Biotechnology  
CGO Complex, Lodhi Road  
New Delhi -110003

To  
Dr. K. Veluthambi  
Chairman, Field Inspection & Scientific Evaluation Committee  
Senior Professor and Head  
Department of Plant Biotechnology  
School of Biotechnology  
Madurai Kamaraj University  
Madurai-625 021,

Dear Sir,

**Sub: Release and cultivation of unapproved HT cotton on large scale – Contamination of parent lines and hybrid seed material of genuine cotton seed producers – Need for specification of protocols for sampling, testing and identifying such unintended contamination.**

**Ref: 1) Our letter addressed to Hon'ble Minister of Agriculture, Govt. of India, dated 14.11.2017**  
**2) Our letter dated 11.12.2017**

This has reference to our letters, cited above.

In particular, in the reference, 2<sup>nd</sup> cited, we have drawn your attention to the grave errors, being adopted by the Seed Inspectors and Analysts in sampling and testing of unapproved HT cotton events and we had also requested therein to notify the sampling and testing procedures, so as to avoid erroneous conclusions, arising out of arbitrary and unscientific sampling and testing at present.

For the sake of brevity, we are not reiterating the contents of our letter dated 11.12.2017 herein. The situation at present is such that, in the absence of specified protocols and procedures, seed companies are also unable to conduct tests of their Bt hybrid cotton seeds to detect presence or absence of unapproved gene in their seed lots and are becoming victims, being unaware of unintended contamination.

We had requested in our letter to develop protocols and procedures with experts including the representatives of NSAI so as to avoid repetition of the present unfortunate developments.

Nothing is heard from you so far, though the matter needs urgent attention. In the meanwhile, the seed companies are put to great harassment, due to non-availability of approved protocols and procedures even with the regulatory machinery.

When the seed companies have to focus on seed procurement and arrivals, processing, quality assurance etc., their precious time and energy is being wasted on non-productive activities for the simple reason of unpreparedness to handle the issue, which has developed now.

We, once again, request to initiate immediate action to develop protocols and procedures, as requested in our letter, and also provide clarification on cost of seed sample, cost of testing and cost of destroying of contaminated seed, if so directed, so that there is clarity on the subject and our members can take action accordingly.

We invite kind attention to rule 15 (1) and 15 (2) of the Rules for the Manufacture, Use/Import/Export and Storage of hazardous microorganisms or cells, 1989, as per which expenses and damages would be borne by the person responsible for the damage. It is a very serious and sensitive issue. Seeds worth crores of rupees are at stake. Fixing of responsibility for damage has to be evaluated with due care and without fear or favour to any party, as the decision has to stand scrutiny of court of law. Hence, the matter needs to be debated and decided at higher level.

Looking forward to early resolution of the contentious issue, which is distracting the seed companies from their main role of being prepared to supply quality seeds to the farmers across the country on time.

Thanking you,

Yours sincerely,



**Kalyan B Goswami**

**Copies to:**



1. Dr. B Rajender, Joint Secretary (Seeds), Dept. of Agriculture, Cooperation & Farmers Welfare, Ministry of Agriculture & Farmers Welfare, Govt. of India, Krishi Bhavan, New Delhi – 110 001
2. Shri Sumit Mullick, Chief Secretary, Govt. of Maharashtra, Main Building, Mantralaya, Dr. Madam Cama Road, Fort, Mumbai - 400032.
3. Dr. J. N. Singh, Chief Secretary, Govt. of Gujarat, Sachivalaya, Gandhinagar – 382020
4. Shri Basant Pratap Singh, Chief Secretary, Govt. of Madhya Pradesh, Mantralaya, Bhopal -462003
5. Shri. Shekhar Prasad, IAS, Chief Secretary, Govt. of Telangana, 3rd Floor, Block C, Secretariat, Telangana, 500022
6. Shri. Dinesh Kumar, IAS, Chief Secretary, Govt. of Andhra Pradesh, Building #1, 1st Floor, A.P. Secretariat, Velagapudi, Guntur - 522237
7. Ms Ratna Prabha, IAS, Chief Secretary, Govt. of Karnataka, Secretariat, M.S. Building, Vidana Soudha, Bangalore – 560001
8. Dr. (Smt.) Girija Vaidyanathan, IAS, Chief Secretary, Govt. of Tamil Nadu, Secretariat, Chennai – 600009
9. Chief Secretaries & Chairman, State Level Biotechnology Coordination Committee of all cotton growing states.
10. Shri AK Sharma, Joint Secretary, Prime Minister's Office, 152, South Block, Raisina Hill, New Delhi-110011
11. Shri Bijay Kumar, Principal Secretary (Agril.), Government of Maharashtra, Agriculture Dept., 5th floor, Annex Bldg., Mantralaya, MUMBAI - 400 032.
12. Shri Sanjay Prasad, Principal Secretary, Department of Agriculture & Cooperation, Block No 5, 1st Floor, New Sachivalay, Gandhinagar 382010
13. Shri P.C. Meena,, Addl.Chief Secretary, Commissioner Agriculture Production & Jail Department, Govt of Madhya Pradesh, Bhopal-462003
14. Dr Rajesh Rajora, Principal Secretary (Agri), Government of Madhya Pradesh, Room No.83, Mantralaya, Ballabh Bhavan, Bhopal - 462003
15. Sri C. Parthasarathi, APC & Secretary, Agriculture, AM & Co-op, Govt. of Telangana, Room No 270, 1st Floor, D Block, Telangana Secretariat, Hyderabad – 500022.
16. Agricultural Production Commissioner (APC), 1st Block, 1st Floor, A.P Secretariat Office, Velagapudi, Guntur 522237
17. Sri Budithi Rajasekhar, Special Chief Secretary to Government (FAC) (Marketing, 4th Block, Ground Floor, Room No:101, A.P Secretariat Office, Velagapudi, Guntur -522237
18. Sri M. Maheshwar Rao, Secretary (Agriculture), Government of Karnataka, 4th Floor, Gate No 3, M.S.Building, Dr.Ambedkar Road, Bangalore 560001
19. Thiru Gagandeep Singh Bedi, Agricultural Production Commissioner and Principal Secretary to Government, Government of Tamil Nadu, Secretariat, Fort St. George, Chennai-600005
20. Commissioner of Agriculture, Commissionerate of Agriculture, Govt. of Maharashtra, Central Building 3'rd floor, Pune 411 001
21. Shri B.M.Modi, Director of Agriculture, Govt. of Gujarat, Sector - 10 A, CH Road, Krishi Bhavan, Gandhinagar.-382010
22. Shri M.L. Meena, Director of Agriculture, Govt. of Madhya Pradesh, Vindhyaachal Bhawan, Second Floor, Bhopal-462001

23. Dr. M Jagan Mohan, Commissioner of Agriculture, Govt. of Telangana, Fateh Maidan, Abids, Hyderabad, 500001
24. Dr. M. Hari Jawaharlal, Special Commissioner, Directorate of Agriculture, Old Mirchi Yard, besides Rytu Bazar, Chuttuguntla Centre, Guntur - 522004
25. G. Sathish, Commissioner for Agriculture, Department of Agriculture, Sheshadri Road, K.R Circle, Bangalore- 560001
26. Dr. M.Rajendran, Director of Agriculture, Agriculture Directorate, Government of Tamil Nadu, Chepauk, Chennai –600005
27. Dr.(Ms.) B.MeenaKumari, Chairperson, National Biodiversity Authority, 5th Floor, TICEL Bio Park, CSIR, Road, Taramani, Chennai - 600 113
28. Dr. Vilas Bardekar, IFS, Chairman, Maharashtra State Biodiversity Board, Jaivavividhata Bhavan, Civil Lines, Van Vasahat, Forest, S.No.49, Salunke Vihar, Wanwadi, Pune - 411 022.
29. Shri A. K. Srivastav, IFS., Chairman, & PCCF, Gujarat Biodiversity Board, B-Wing, 5th Floor, Aranya Bhawan, Sector -10-A, Gandhinagar - 382010,
30. Shri. Basabt Pratap Singh, IAS, Chairman & Chief Secretary, Madhya Pradesh Biodiversity Board, O/O. The Chief Secretary, Secretariat, Government of Madhya Pradesh, Mantralaya, Vallabh Bhawan, Bhopal - 462011,
31. Sri.A.K.Srivastava, IFS, Chairman, Telangana State Biodiversity Board, 6th Floor, Chandra Vihar Complex, M.J.Road, Nampally, Hyderabad – 500 001
32. Sri S B I Misra, IFS (Retd.), Chairman, Andhra Pradesh State Biodiversity Board, Flat No. 209,308 and 311, Walnut Block, Raintree Park, Nagarjuna Nagar, Opp. Nagarjuna University, NII-5, Guntur District, Andhra Pradesh – 522510
33. Shri. S. P. Seshadri, Karnataka Biodiversity Board 4th Floor, "Vanavikas" 18th Cross, Malleshwaram, Bangalore - 560003.
34. The Chairman, Tamil Nadu Biodiversity Board, O/o. Hon'ble Minister for Forests, Secretariat, Govt. of Tamil Nadu, Chennai – 600009.