

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



Ref. NSAI/2016/089

26.07.2016

Dr. S. R. Rao  
Adviser  
Department of Biotechnology  
Ministry of Science & Technology  
New Delhi

Dear Sir,

**Subject: Approval of Bt. Cotton Hybrids on the basis of SAU trial Report**

This is with reference to the approval process of Bt. cotton Hybrids for commercial release. For the commercial release of Bt. cotton Hybrids, Seed Industries are required to make application to DBT. Based on the ongoing practice over the year's seeds companies have been submitting their hybrids to State Agricultural Universities for conducting trials and the trial report is submitted to DBT.

However, we have been informed that this year onwards there is an additional requirement of Bollworm damage data in SAU trial report by DBT. Ever since the SAU data has been made compulsory the said additional data regarding Boll worm damage has never been sought till date. This condition was informed by DBT, when the data has already been given by SAUs. We have learnt that due to the lack of this additional data requirement many of the qualifying hybrids have been rejected. As the data of bollworm damage is not provided to the seed companies by the Universities, they are unable to provide the same to DBT. It's also worthwhile to mention that few SAU may not have even taken the data for Bollworm damage for Bt cotton Hybrids. If there is any change in the criteria for data collection, the same should be intimated by DBT beforehand.

As a representative body of seed industry we would like to request DBT to kindly reconsider approval of the rejected hybrids (those hybrids which have been rejected due to lack of bollworm damage additional data requirement). This is our humble submission that the seed industry should not suffer injustice because of the above clause.

Thanking you,

Yours sincerely,

**Kalyan B. Goswami**