**Dr. Kalyan B. Goswami**
Director General

nsa National Seed Association of India
(Registered under the Societies Registration Act.)

Ref. NSAI/2017/0131

Date: 24.12.2017

Shri Ravula Venkaiah
Vice President
All India Kisan Sabha
Dasari Nagabhushanrao Bhavan
Hanumanpet
Vijayawada – 520 003

**Dear Sir,**

**Ref: Your letter dated 20.12.17 regarding loss of agronomic value for BG-II trait with suggestion to make available Bt cotton seeds with BG-I trait**

**Sub: The practical aspects related to this suggestion – Reg.**

We are thankful to you for bringing your views on this subject which is currently is of serious concern to members of our association as well as regulators besides the farmers. While we welcome the suggestion, there are certain practical aspects which needs to be understood by all to implement your suggestion of bringing to market new cotton hybrid seeds only with BG-I trait so as to reduce the seed cost.

1. The cost of production of seeds of any hybrid either with BG-I or BG-II trait is same. The old BG-I varieties which are developed till 2010 are no longer preferred by the farmers since several new hybrids are developed subsequent to 2010 with superior agronomic features like earliness, bigger boll, tolerance to whiteflies and other sucking pests, better drought tolerance etc.

   Since BG-I lost efficacy to Pink Bollworm (PBW) around 2008-09, all the breeding programs of all the member companies continued only with BG-II trait. As you are aware while BG-II trait confers resistance to bollworms other traits stated above are also very important for the farmers. Due to changing agro climatic conditions, breeding to develop new hybrids has to be contemporary and up to date. To develop new hybrids only with BG-I trait which if started now may still take further time of 3-4 years. Further, the multiplication of foundation seeds and the production of hybrid seeds also takes 2-3 years. Therefore, it is not possible to switch and make seeds of new hybrids available only with BG-I trait immediately.

   We have represented to the MoAFW to maintain the same seed value for hybrids expressing either BG-I or BG-II trait. The copy of the appeal we have submitted is also attached for your information. However, in the notifications pertaining to 2016 and 2017, the seed value of BG-II hybrids was kept at Rs. 751/- whereas the seed value of BG-I hybrids is kept at Rs. 635/-. To encourage the seed companies to develop new BG-I hybrids and make them available quickly to the farmers, the seed value will have to be maintained at the same level.

909, SURYA KIRAN BUILDING, 19, KASTURBA GANDHI MARG, NEW DELHI- 110001 (INDIA)
Phone: +91-11-43533241-43, +91-11-43533246 (D) Fax: +91-11-43533248
E-mail: kalyan.goswami@nsai.co.in, Website: www.nsai.co.in

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2. As you are aware the costs of seed production are increasing every year due to increase in wages, fertilizers, agro chemicals, diesel etc. However, the seed value has been kept at the same level around Rs. 751/- since 2011. This is causing serious disturbance to the seed companies to invest in new hybrid development.

3. To remove the second gene from the currently popular BG-II hybrids is possible through breeding. However, this takes the same amount of effort and time (4-6 years including development and seed production) like developing new BG-I hybrids as explained above. Therefore, it is not possible to remove the second gene even though it is not giving any efficacy to the farmers.

4. We agree with the views expressed in your letters to the MoAFW completely and we enclose the letters we have submitted in this regard. We feel, the trait value has to be NIL for BG-II or the price order shall have the stipulation that the trait developer who is receiving the trait value is fully responsible for the performance / efficacy and in case of damage by PBW, farmers shall have right to claim compensation from the trait developer.

We also would like to state that the roles and responsibilities are well defined under the provisions of CSPCO, 2015 and any deficiency related to the trait will have to be the complete responsibility of the trait developer and deficiency related to the seed quality will be the responsibility of Seed Company. We request you to spread this awareness among the farmers.

Thanking you,

Yours sincerely,

**Kalyan B. Goswami**