

Dr. Kalyan B. Goswami
Executive Director



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To
Shri Bijay Kumar, IAS
Principal Secretary (Agriculture)
Dept. of Agriculture & Animal Husbandry,
Dairy Development & Fisheries
Mantralaya Annex
Mumbai – 400 032

To
Shri S P Singh,
Commissioner of Agriculture,
Commissionerate of Agriculture,
Govt. of Maharashtra,
3rd Floor, Central Building,
Pune-411001

Dear Sirs,

Sub: Pink Bollworm infestation in Bt cotton – Booking of cases against seed companies and dealers – Reg.

In light of the wide spread damage due to Pink Bollworms (PBW) in cotton, there are several complaints by the farmers. Based on such complaints, we understand that cases are being booked by the police as well as the agriculture department against seed dealers and seed companies in Maharashtra. In this regard, we submit the following facts for your consideration.

1. There are more than 300 Bt cotton hybrids which are being sold in Maharashtra by various companies under the provisions of Seeds Act, 1966, Seed (Control) Order, 1983, Environment (Protection) Act and Cotton Seeds Price (Control) Order, 2015 (CSPCO).
2. Bt cotton traits expressed by single gene or two genes are approved by GEAC on Event Based Approval Mechanism (EBAM) under the provisions of Environment (Protection) Act (EPA). After a trait is approved for biosafety, the breeders use the trait for developing several new hybrids which are again approved by either GEAC or from 2017 by the Ministry of Agriculture, Govt. of India. The seed companies are responsible for maintaining gene purity.

3. The seed quality parameters of cotton seeds are stipulated under the provisions of Seeds Act and in case of Bt cotton seeds, the following quality parameters are to be mandatorily maintained by seed companies.

Label No:	
Kind (Crop)	:
Variety	:
Lot No.	:
Date, Month & Year of Test	:
Valid Upto	:
Germination (Min) %	: 75
Physical Purity (Min) %	: 98
Genetic Purity (Min) %	: 90
Bt Gene	: Min 90 %
Net Weight	:
Recommended for cultivation in :	
Non Bt Refugia seed shall not contain Bt gene in more than 5% of the seeds	

4. There are unfounded allegations that the refugia seeds are of bad quality. However, the Govt. of India notified the minimum quality standard for refugia seeds as per which they shall have a maximum of 5% seeds with Bt gene. The Seed Inspectors collect and analyse thousands of seed samples to assess the seed quality and initiate suitable action against any seed lots and their producers if the quality standards are found to be not up to the minimum prescribed levels. Based on the data, only a small percentage of seed lots tested may be found to not having the minimum standards for which in any case the concerned company is responsible. Therefore, the damage of PBW or the development of resistance cannot be attributed to the seed quality.
5. The PBW incidence in Bt cotton is due to the insect developing resistance to the protein produced by the Bt cotton plants. The subject was also discussed in the meeting that was called by the Ministry of Agriculture, Govt. of India on 25.10.2017. The Hon'ble Commissioner of Agriculture, Maharashtra, Shri S P Singh also attended the meeting. It was informed by CICR that the development of resistance by PBW happens due to natural ability of the insect and farmers have to take various steps to control the PBW like monitoring the PBW incidence with Pheromone traps and undertaking chemical interventions as and when the appearance of insect crosses economic threshold level. It may be kindly noted that if the seed lot does not have the minimum gene purity as per the standards specified, only then the seed company is liable. Once, the seed lots meets the minimum standard of gene purity, there cannot be any further responsibility on the seed company with reference to the efficacy of the Bt trait.

6. The Bt cotton seed prices are regulated by the Ministry of Agriculture, Govt. of India under CSPCO, 2015. As per the clause 5 of the order, the trait value towards the Bt cotton trait developed by the trait developer and the seed value towards the efforts of the seed company for hybrid development, seed production, marketing and distribution are clearly mentioned. The seed company collects the MSP from the farmer and pays the trait value to the trait developer. As per the price order for the financial year 2017-18, the trait value for single gene traits is NIL and for two gene trait is Rs. 49/- per packet.
7. The responsibility towards the performance of the trait shall therefore be on the trait developer whereas the responsibility for the seed quality as explained above in point 3 remains with the seed company.

On account of the above clarifications, we request you Sir, to direct the officials regulating the seed quality and registering complaints of the farmers to register the complaints based on the roles and responsibilities of seed companies and trait developers.

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. Dr Anand Kumar Singh, Deputy Director General (Crop Sciences), Indian Council of Agricultural Research (ICAR), Krishi Bhavan, New Delhi– 110 001

Encl: Copy of the letter submitted by NSAI to the DDG (Crop Science) who chaired the meeting on 25.10.2017