

Ref. NSAI/ 2017/ 129

Date: 26.12.2017

To

- 1) Shri Budithi Rajasekhar, IAS,
Special Chief Secretary to Government (FAC) (Marketing),
4th Block, Ground Floor, Room No. 101,
A.P. Secretariat Office, Velagapudi,
Guntur – 522237.
- 2) Agricultural Production Commissioner,
1st Block, 1st Floor,
A.P. Secretariat Office,
Velagapudi,
Guntur - 522237
- 3) Dr. M. Hari Jawaharlal, IAS,
Special Commissioner, Directorate of Agriculture,
Old Mirchi Yard, Beside Rytu Bazar,
Chottuguntla Centre,
Guntur – 522004

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 dated 14.11.2017, addressed to Hon'ble Minister of Agriculture, Govt. of India,
(2) Our letter dated 11.12.17, addressed to GEAC, RCGM and FISEC and copied to 1 to 3 above and others.

We invite kind attention to our letters, cited above, wherein we have submitted our views on the subject, which are pertinent to the Department of Agriculture, Andhra Pradesh also to take into kind consideration. We enclose, herewith, a copy of our letter, 2nd cited, for ready reference.

We state that the procedure, that is being adopted to detect presence of HT gene, wherein a few seeds from a seed lot are being crushed and either ELISA strips or DNA is being extracted from such bulk material (formed by crushing seeds together) is very crude, unscientific and therefore

prone to serious errors. Even if there is a single seed with the HT gene out of the 10 or 20 seeds crushed, the sample tests positively only. This is a serious flaw in sampling and testing.

Such a faulty sample, adopted by the Seed Inspectors, can lead to an erroneous conclusion that the said seed lot is of unapproved HT cotton, though it is due to unintended contamination and is not even in the knowledge of the said seed company. It is pertinent to state that there is no protocol for a seed company to test for unintended presence of unapproved events including HT event. Further, there are no guidelines, as how to handle, if it is revealed from the test that the said particular lot is unintentionally contaminated with an unapproved event. The Ministry of Agriculture, Environment, Science and Technology and the ICAR need to debate this issue, come out SOPs and give permanent solution to such problems, otherwise small and marginal seed companies cannot sustain by destroying the unintentionally contaminated lots, having produced the said lots by investing their money, time and efforts.

We have requested in our letter, 2nd cited, to GEAC, RCGM and FISEC to immediately develop protocols and procedures in consultation with experts including the representatives of NSAI, so that appropriate processes and procedures are prescribed, which need to be mandatorily followed by the Seed Inspectors and Seed Analysts to identify the real culprits as well as ensure no harassment to the genuine operators. In the absence of prescribed procedures and protocols and proper guidelines to the Seed Inspectors and Analysts, only the genuine seed companies will suffer.

We have taken up the above issues with GEAC, RCGM and FISEC through our letter, 2nd cited, and we request the Government of Andhra Pradesh also to take up the matter with the above three concerned bodies and obtain from them the SOPs and Protocols for field functionaries for each new trait expressed by an event before permission is accorded for field trials so that, in future, the problem is addressed before it grows out of proportion, as it has happened now.

We had also requested GEAC, RCGM and FISEC to clarify urgently on the cost of testing and cost of destroying the seed lots with unintended contamination, so that we can, accordingly, guide our members to claim the costs of testing and cost of destroying the seed lots with unintended contamination. We state that it would be unfair and unjust to penalize the small and innocent seed companies to forego the cost of seed sample drawn, cost of testing and also to bear huge financial loss due to destruction of cotton seeds, produced by them investing huge amount, for no faults of theirs.

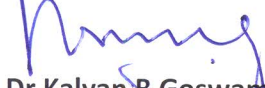
We would like to reiterate that we would support the actions of Government of Andhra Pradesh in weeding out culprits, who are producing and spreading unapproved HT cotton seeds. Our only request is to develop procedures to identify real culprits and differentiate genuine operators from such illegal players. It may be noted that sellers of HT seeds may not even have a Seed License. It is also pertinent to note that contamination can be in few lots in small percentages but not in all lots. Whereas, the illegal players would have presence of gene in over 90% seeds.

In view of the urgency, we had also requested GEAC, RCGM and FISEC in our letter dated 11.12.17 to act on our request on urgent basis. We hope, they would do so and request you not to take

any precipitative action and to take a holistic view of the matter and to ask the above three regulatory bodies to act on our request expeditiously so as to act systematically to catch culprits and eradicate problem.

Thanking you,

Yours sincerely,



Dr Kalyan B Goswami
Director General, NSAI

Encl: As above

Copies to:

1. Dr. B Rajender, IAS, 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 Dinesh Kumar, IAS, Chief Secretary & Chairman, State Level Biotechnology Coordination Committee, Government of Andhra Pradesh, Building #1, 1st Floor, A.P. Secretariat, Velagapudi, Guntur - 522237
3. Sri.S.B.L.Misra, IFS (Retd.), Chairman, Andhra Pradesh State Biodiversity Board, Flat No. 209,308 and 311, Walnut Block, Raintree Park, Nagarjuna Nagar, Opp. Nagarjuna University, NH-5, Guntur District, Andhra Pradesh – 522510