

Dr. Kalyan B. Goswami
Executive Director



Ref. NSAI/2016/126

Date: 24.10.16

Dr. Amita Prasad
Additional Secretary, MoEF
Chairperson, Genetic Engineering Appraisal Committee (GEAC)
Ministry of Environment & Forests
Government of India
New Delhi

Respected Madam,

Sub: Submission of information as a follow up to the discussions held on 20.10.16

- Ref: 1. Meeting of the Seed Industry delegation on 20.10.2016 in your office.
2. All the earlier correspondence with reference to the procedures adopted by GEAC which are leading to monopolization of cotton crop by Bt trait developer.

We thank you for giving us time to submit our views and for interacting with us on the subject referred above. We provide the following clarifications to the points that came up in the discussion.

1. The Seed Industry has been representing since 2003 that as mandated by Environment (Protection) Act (EPA), GEAC may confine to transgenic event approvals based on biosafety rather than continue beyond event approval with hybrid approvals also. Nowhere in the world, after biosafety approval of a transgenic event new varieties or hybrids, developed by various breeders through their own R&D, carrying the approved transgenic event, are regulated under environment safety provisions. In India, there are specific enactments like Seeds Act, 1966 and the Seed (Control) Order, 1983 which govern not only the release of new hybrids but also their seed quality parameters through a well-established and proven network. If GEAC undertakes event approval the question of NOC/LOC does not arise at all.
2. Though we have been representing since 2003, GEAC never replied to any of our letters due to which one of our member associations was constrained to approach the Hon'ble High Court, Hyderabad seeking for appropriate relief. As explained by us in the discussion, while the opinion of NSAI and its members, Monsanto or ABLE-AG can be considered by GEAC, the replies to the contentions raised by us have to be taken from an independent legal expert not connected with either side in accordance with law. We are grateful to you for accepting to this proposal.
3. There are several false allegations and campaigns based on false notions, that are being spread by Monsanto to further their monopoly by continuing the current processes and procedures being followed by the regulatory authority, which are not correct as per law, hence we have serious objections

