

R K Trivedi
Executive Director



Ref. NSAI/2022/097

Dated. 12.09.2022

To,

The Joint Secretary (Seeds)
Department of Agriculture and Farmers Welfare
Ministry of Agriculture and Farmers Welfare, Govt. of India
Krishi Bhavan, New Delhi – 110001

Subject: Mixing of Non BT Seeds with Bt cotton seeds in seed packets (RIB Concept)

Ref: i. JDA (HYVP) O/o Director of Agriculture and Farmers Welfare, Punjab Memo. No. ADO (Seed)/HYVP/1190 dated 29.08.2022
ii. GoI Letter No. 6-2/2017-SD (Pt) dated 30.03.2021

Sir,

It has come to our notice that the Joint Director Agriculture (HYVP), Punjab, vide letter referred to above, has written to the Joint Secretary (Seeds), DAFW, Ministry of Agriculture and Farmers Welfare, informing that mixing of non-Bt seeds with Bt seeds (RIB concept) has resulted in up to 90% crop failure in district Fazilka and the farmers have suffered huge losses. It has also been mentioned in the letter that mixing of Bt and non-Bt cotton seeds in the seed packets was not in the prescribed manner which led to crop loss due to virus.

In this regard, it is mentioned that the Seed Division of Department of Agriculture and Farmers Welfare, Government of India has introduced the RIB system in Bt Cotton stipulating the mixing of isogenic line/non-Bt line (to the extent of minimum of 5% and maximum of 10% of the total quantity of Cotton seeds in the seed packet) after thorough study by the ICAR Scientific community, including CICR and also after discussing with various stakeholders as the present system of keeping separate packet of non-Bt with Bt cotton seeds had resulted in breaking the resistance towards PBW in Bt Cotton crop.

Since, gene purity in case of RIB concept is specified for both minimum and maximum levels, there is all the opportunity for better utility of Bt seeds for boll worm resistance management under RIB concept. As far as incidence of other pests and diseases in the Bt cotton crop as reported in the Punjab Government letter may be because of poor crop management or some other reason which needs to be investigated by ICAR/State Government. It is also to mention that such incident has not been noticed in any other part of the country, hence, it seems to be a localized issue.

With respect to the report of higher percentage of non Bt seeds in the RIB packets, more than the prescribed limits of 5-10%, as mentioned by Joint Director of Agriculture (HYVP), Punjab, it is to indicate that this falls under the domain of Seed Law Enforcement authorities at State level and they should check it. Hence, any violation of

non-Bt limits in RIB, genetic purity or toxin limits contrary to the prescribed limits may be investigated by the State Seed Law Enforcement agency and action should be taken accordingly.

It is therefore, reiterated that RIB concept, which has been introduced after scientific study and consultation with ICAR may not be discontinued unless we have some scientific base for it.

Yours sincerely,



R K Trivedi

Directorate of Agriculture and Farmers Welfare, Punjab

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(HYVP Branch)

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To

**Joint Secretary (Seeds),
Govt. of India, Ministry of Agriculture & Farmers Welfare,
Department of Agriculture, Cooperation & Farmers Welfare,
Krishi Bhawan, New Delhi.**

Memo No. ADO(Seed)/ HYVP/ 1190


Date: 07.09.2022

Subject: Regarding mixing of non Bt seeds with Bt cotton seeds in seed packets (RIB concept)

Ref.: CAO Fazilka Endst. No.5592 dt. 01.09.2022 and Sanyukt Kissan Morcha letter dt. 29.08.2022

In context to the above cited subject and references, GoI vide letter no. 6-2/2017-SD IV(Pt.) dated: 30-03-2021 had instructed all Bt cotton seed companies to develop isogenic versions of the corresponding Bt hybrids to implement complete use of Refugia in bag (RIB) concept till 30.06.2021. Accordingly during kharif 2022 season all Bt cotton companies vide notification no. S.O. 1163 (E) dated 15.03.2022 were instructed to sell 475 grams RIB seed packet containing minimum 5% and maximum 10% non Bt cotton seed .

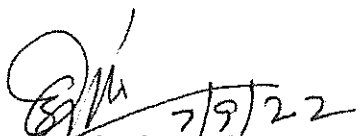
Some farmers of Dist. Fazilka through Sanyukt Kissan Morcha, Abohar & Chief Agriculture Officer, Fazilka have reported that due to mixing of non Bt seeds with Bt cotton seeds (RIB concept) has resulted in upto 90% crop failure due to various diseases and pests and they have suffered huge losses. They have also complained that more quantity of non Bt cotton seeds have been mixed with Bt cotton seeds in packets by Bt companies which has resulted in crop loss due to virus. So, kindly do the needful in the interests of the farming community so that farmers of the state do not suffer losses.


Joint Director Agriculture (HYVP)
O/o Director of Agri. and Farmers Welfare, PB
7/9/22

Endst No. ADO(Seed)/ HYVP/ 1191

Dated: 07.09.22

A copy of above is forwarded to Chief Agriculture Officer, Fazilka for intimation to Sanyukt Kissan Morcha, Abohar.


Joint Director Agriculture (HYVP)
O/o Director of Agri. and Farmers Welfare, PB
7/9/22