



DECCAN DEVELOPMENT SOCIETY

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August 14, 2010

To
Dr. P. L. Gautam,
Chairman,
National Biodiversity Authority
5th Floor, TICEL Bio Park,
Taramani Road,
Taramani,
Chennai - 600 113

Subject: Sow peace across Indo-Pak fields not genetically modified Bt cotton!

Dear Dr. Gautam,

We write to you collectively to voice our common concern on a recent decision of the Genetic Engineering Appraisal Committee (GEAC) in India to allow the US multinational corporation (MNC) Monsanto operating in India to export genetically modified (GM) Bt cotton to Pakistan. In the 100th meeting of India's GEAC held on 12th May 2010 the decision was taken to allow for the export of Bollgard II Cotton variety expressing cry 1Ac and cry 2Ab (Event-MON-15985) to Pakistan by M/s Monsanto Holdings Pvt. Ltd. in India. The intended purpose of the export is for large scale field trials under different cotton growing areas of Pakistan. The proposed shipment is to be total 200 kg Bt cotton hybrids expressing cry 1Ac and cry 2Ab commercialised in India since 2006. This is on the conditional on approvals from the National Biosafety Committee in accordance with the Pakistan Biosafety Rules, 2005 and the Pakistan National Biosafety Guidelines, 2005. It is also subject to the approval of India's National Biodiversity Authority (NBA).

As the MOEF in India is the nodal ministry both for the GEAC and the NBA, we would like to highlight that

- At this point of time the role of the GEAC and its decisions are itself under question. Clear concerns have been raised by farmers' groups and ordinary people on the role of the GEAC. The regulatory body and the inadequate 'biosafety' regime under it is also under scrutiny in an ongoing public interest litigation pending before the Supreme Court of India (*Aruna Rodrigues and others versus Union of India and others*). Moreover, there is much debate with regard to revamping India's biosafety regulatory regime through the Biotechnology Regulatory Authority of India (BRAI) Bill, 2009, floated by the Department of Biotechnology. And the proposed BRAI is intended to replace the GEAC. With respect to the introduction of Monsanto-MAHYCO's Bt brinjal in India as the first commercial GM food crop, you know well that the GEAC's decision was also called to question. In such a situation, while we are treading with caution we should think twice before allowing GEAC to export a potential problem to our neighbours!
- As regards access of raw genetic material by the biotech industry, under India's Biological Diversity Act, 2002, the NBA is meant to screen applications with such requests. Likewise, it is meant to screen applications for transfer of research results to a third party. Thus the NBA

landed up playing a role in allowing for the transfer of MAHYCO's GM Bt brinjal event from India to our neighbours in countries like Bangladesh and the Philippines. It is indeed ironic that an Authority whose main focus ought to be biodiversity conservation is playing a facilitative role in clearing GM applications. The power of the NBA to do so without due Biodiversity Management Committees (BMC) consultations at the local level is another contentious issue. Without the structures for the biodiversity regime in place for implementation the decision can be legally challenged as well. For instance, in the BT brinjal case though the Tamil Nadu Agriculture University had used the local brinjal variety in the making of GM brinjal, but with no State Biodiversity Board in Tamil Nadu nor any BMC formed at the local level, the transfer of local brinjal germplasm for MAHYCO's GM product from the very State in which the NBA is based (Chennai) is a serious lapse.

The latest decision of the GEAC on Bt Cotton is not a welcome development for Pakistan and its small farmers. We, from Pakistan, feel that taking inspiration from the farmers' struggles and several anti-GM activists in India (studies attached), we can not support the above move even in the name of so-called 'field trial'. We join hands with the pro-biodiversity anti-GM people of India. This solidarity is critical at a time when the Government of Pakistan has formally signed a one billion dollar agreement with Monsanto, USA in 10th April 2010, for the purchase of its Bt cotton seeds. Even the Pakistan Government, as per press reports, is not interested to get this seed from India.

It may be mentioned that farmers in Pakistan have been growing cotton from Bt seeds (some smuggled possibly from Indian Gujarat), for more than 3 to 4 years. This is a "deliberate accident". Different field researches have amply shown that Bt growers have suffered badly as a result. Apart from high costs (as its needs of water and other inputs is high), this so called pest-resistant plant is attacked by all kinds of pests. Mealy bugs that have destroyed cotton fields and spread to other plants as well have come with Bt. Bt cotton's adverse impact on environment has also been documented by studies in Pakistan.

The Indian Government will have to adopt a more responsible position in the Asian region. As India becomes an important hub for the seed industry in the Asia Pacific region. We Indians signing this letter feel that we can not allow it to be used as a base for then exporting hybrids and GM seeds to other countries in this part of the world. We can't do to others what we complain that US and its Monsantos do to us! This also puts a huge onus on India's National Biodiversity Authority (NBA), which ought to realise the significance of the biological resources of this mega diverse part of the world and not grant approvals for potentially bio-destructive technologies. We urge that India take a more responsible position as part of like-minded mega diverse countries.

If the proposed SAARC Seed Forum is to play a meaningful role, it ought to provide and promote farmers' seeds, rather than those of private seed companies, be they US, Indian or Pakistani. For example, some of the Indian companies like J K Seeds, Namdhari Seeds, Nuziveedu Seeds, Rasi and Vibha Seeds have already entered the markets in Bangladesh, Pakistan, Sri Lanka and Nepal in the SAARC region. Both governments should also know better that to allow a US MNC – Monsanto, to take control over our seed and food in South Asia. There is clearly a pattern here. US aid and trade policies through USAID funds, the USTR and its Business Councils respectively in both our countries are pushing their R&D agendas as well as lobbying for the legislative changes conducive to its biotech industry and economic and political interests.

We, a group of small farmers networks, concerned peoples, NGOs and environment activists, from both India and Pakistan urge the concerned agriculture and environment authorities on both sides of the border to reconsider the decisions that promote GM seeds and that too across our borders. If we spread potentially hazardous GM crops, we all will sow the ill effects in the region. As genetic contamination knows no political boundaries. Safeguarding the agricultures of our peoples and respecting each others customary food, seed and farm practices has to be an intrinsic part of any strategy to not only make peace across our borders but also to make peace with our Earth. We can not expect to have peace in India or Pakistan if we export GM terror! Therefore, we need a new *Seed Diplomacy* to improve relations, something that we as ordinary people are willing to work

towards. The CBMs (confidence building measure) needed are those that build the confidence of our own farmers about their own agriculture and not corporate-sponsored biotech farming with all its social, political and ecological problems.

We therefore together urge you to immediately cancel the GEAC decision to export the said Bt cotton seed to Pakistan and recall the relevant communications to that effect sent to the project proponents, concerned government departments and other agencies as confirmed in the 30th July 2010 meeting of the GEAC.

Anticipating your response.

With warm regards



(p. v. satheesh)
Convenor, South Against Genetic Engineering

1. Deccan Development Society, India
2. GRAIN
3. Kalpavriksh, India
4. Roots for Equity, Pakistan
5. SAGE South Against Genetic Engineering, India

Attached as above:

Copies to:

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Minister,
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