

# **Testbiotech comment on EFSA GMO Panel's Scientific Opinion on application (EFSA-GMO-NL- 2010-87) for the placing on the market of genetically modified herbicide tolerant oilseed rape GT73**

## **Logo:**

TESTBIOTECH Background 18- 3 - 2013



Testbiotech comment on EFSA GMO Panel's Scientific Opinion on application (EFSA-GMO-NL-2010-87) for the placing on the market of genetically modified herbicide tolerant oilseed rape GT73 for food containing or consisting of, and food produced from or containing ingredients produced from, oilseed rape GT73 under Regulation (EC) No 1829/2003 from Monsanto

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### **Summary:**

This comment concerns a genetically engineered, herbicide-tolerant (glyphosate) oil seed rape, GT73, which produces two different enzymes that confer herbicide resistance ( CP4 EPSPS and GOX protein).

EFSA did not request a new investigation into GT73, but instead based its opinion mostly on studies that are 10-20 years old. In the light of the many significant findings in compositional analysis and feeding studies, much more investigation is needed before any conclusion can be drawn on the safety of this product. Further, EFSA did not take into account the true potential for persistence and invasiveness of the genetically engineered plants that will emerge from spillage. Residues from spraying with herbicides were not assessed.

The EFSA risk assessment is not based on sufficient and sufficiently reliable data. Further, it does not identify the true range of uncertainties (as requested by Regulation 178/2002) and the current limits of knowledge. The risk manager should therefore reject this opinion.

### **Molecular characterisation**

The data as presented are not conclusive. The molecular characterisation of GT73 oilseed rape does not meet current scientific standards. Some of the investigations were performed more than ten years ago and should have been complemented by recent data. There was no inclusion of methods to screen the transcriptome, metabolism and proteome, and the ELISA tests used to measure the expression rate of the additional proteins were not validated in ring tests.

### **Comparative analysis**

The data as presented are not conclusive. The outcome of the field trials showed many statistically significant differences in composition, which should have triggered further investigations into the relationship between the identified difference and the genetic modification process and interaction with the environment. Further, the dossier presented by industry are around 10-20 years old and do not meet current scientific standards. These deficiencies concern the validity and quality of the submitted sets of data as well as its quantity. The dossier of industry should have been complemented by much more recent data.

Furthermore, since glyphosate is a chelating agent, data on the micronutrient content of the GMO grown with and without glyphosate application and a comparison to its non-GM counterpart are necessary for the nutritional assessment.

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[Comment\\_GT73\\_Import\\_2013.pdf \[1\]](#)

Größe

172.98 KB

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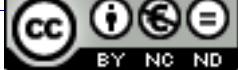
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