

# Testbiotech comment on the Scientific Opinion on an application (EFSA-GMO-NL-2005-24) for the placing on the market of the herbicide tolerant genetically modified soybean 40-3-2 for cultivation under Regulation (EC) No 1829/2003 from Monsanto

## Logo:

TESTBIOTECH Background 25 - 7 - 2012



Testbiotech comment on the Scientific Opinion on an application (EFSA-GMO-NL-2005-24) for the placing on the market of the herbicide tolerant genetically modified soybean 40-3-2 for cultivation under Regulation (EC) No 1829/2003 from Monsanto

Christoph Then & Andreas Bauer-Panskus

### Summary

Some points criticized by Testbiotech are:

- The functional stability of the gene construct was never tested under extreme climate conditions such as drought and flooding which are likely to occur more often under the ongoing climate change.
- Many investigations show changes in the plants' composition after spraying with glyphosate. But most of these studies were not assessed by EFSA.
- The data concerning food safety of the processed food and feed do not cover all relevant products. For example, data on products such as soybean sprouts prepared from soybeans and soybean milk are missing.
- Residues from spraying and potential health effects that those compounds might cause were completely left out of EFSA risk assessment.
- EFSA overlooked that permanent ingestion of the soybeans that can show up to 20 mg/kg of residues from spraying (as allowed by pesticide legislation) might affect microbial flora in the gut of consumers or farm animals.
- Several documents produced by EFSA emphasize the need for specific risk assessment of genetically engineered plants in regard to infants and other groups of consumers more susceptible to allergic reactions. However, in its opinion, EFSA has disregarded this problem completely.
- No data are available for risks of pollinators such as honey bees, which were EFSA considers an essential part of environmental risk assessment.
- EFSA acknowledges that negative effects on soil organisms and plant diseases have to be expected, but then comes to the contrary conclusion that these effects are of only minor relevance.

1

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File attachments: Anhang



[TBT Comment\\_RR Soybean\\_40\\_3\\_2\\_Cultivation.pdf](#) [1]

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226.5 KB

Testbiotech members involved: [Andreas Bauer-Panskus](#) [2]

[Christoph Then](#) [3]

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- [3] <https://www.testbiotech.org/user/6>
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