



**Friends of
the Earth
Europe**



Mr Commissioner Andriukaitis
European Commission
B-1049 Brussels

2 March 2015

Concerning new evidence about GM maize 1507 and the EU's risk assessment

Dear Commissioner,

We understand that the Commission is preparing a decision regarding authorisation of the genetically modified (GM) '1507' maize from Pioneer Hi-Bred International. We would like to urgently draw your attention to the fact that the Genetically Modified Organisms (GMO) panel of the European Food Safety Authority (EFSA) has made a request to re-evaluate the risk assessment of this GM maize following the publication of significant new research that undermines previous safety assessments. The EFSA is hoping to complete the new assessment by May 31st 2015.

The chair of the GMO panel at the EFSA wrote to the Executive Director of the EFSA in December 2014 requesting permission to re-evaluate their previous assessments for the 1507 maize, as well as the similar GM maize strains MON810 and Bt11 (letter attached). This request is based on new research using the largest dataset of maize pollen published to date. Based on 10 years of monitoring, the authors conclude that the EU model for risk assessment underestimates impacts on endangered species such as butterflies and moths. The researchers conclude that, *"With respect to a general risk management of Bt maize cultivation, and based on the precautionary principle... buffer distances in the kilometer range are required to prevent exposure of protected and/or sensitive species to Bt pollen, rather than ranges of tens of meters as proposed in the actual EU risk management."*

The authors of the research highlight that the current EU risk assessment to define buffer zones between GM maize and ecologically sensitive areas substantially underestimates the risk and that *"previous risk assessments and conclusions regarding distances, potential exposure, and effects on non-target organisms should be revised in the light of these findings"*. The EU's risk assessment and its impact on sensitive areas and species has been the main controversy about the GM maize 1507 and the main content of the last four EFSA opinions. The new findings question the basic assumption of the current risk assessment model that a distance of 10 metres would be safe.

We urge the European Commission to review the overall risk assessments provided to date by the EFSA and demand much more rigorous investigations before any conclusion is drawn on the safety of GM plants.

Current EFSA modeling is largely based on assumptions and lacks empirical data, as this new research highlights.¹

We would also add that the findings have major implications for the levels of contamination of conventional and organic agriculture, seed purity and the ability of the farming industry to provide GM-free ingredients to the food industry.

On the basis of this research it is therefore clear that GM maize cannot be grown in the EU without causing widespread contamination or threatening endangered species. We therefore urge you to reject the authorisation of 1507 and Bt11 maize, and halt the cultivation of MON810 in order to take the findings of the research fully into consideration.

Should you need further information then please do not hesitate to contact us.

Yours sincerely,

Magda Stoczkiewicz
Director of Friends of the Earth Europe



Christoph Then,
Executive Director Test Biotech



¹ Then C. & Bauer-Panskus A. (2014) Genetically engineered Maize 1507: EFSA cannot invalidate evidence of substantial gaps in risk assessment, Testbiotech Background, 2 - 6 – 2014, <http://www.testbiotech.org/node/1030>