



**Commissioner Vytenis Andriukaitis
DG Health and Food Safety (SANTE)
European Commission
Rue de la Loi 200
1049 Brussels**

Brussels, 24 February 2016

Cc: Mr Ladislav Miko, Deputy Director General for Food Safety; Ms Chantal Bruetschy, Head of Unit Biotechnology

Re: Open letter on new invasive species in Spain that can outcross with genetically modified maize

Dear Commissioner,

The undersigned organisations hereby wish to officially inform you that the acclaimed ancestor of cultivated maize, teosinte, has been present in Europe already since 2009. It is currently occurring primarily in Spain (AGPME, 2014), but teosinte was also identified in France several years ago¹. On the basis of the existing information available from the authorities of the affected regions in Spain, it appears that the densities of the teosintes have reached serious damaging levels, and their phenology and population dynamics strongly suggest that these teosinte plants behave like a serious invasive plant. It appears that within a very short time (less than 5 years), teosinte populations have been spreading fast and multiplying at a very high rate in the regions of first detection. In 2014, teosintes were recorded already in 3 Spanish 'Autonomous Communities': It was first detected in Aragon and Catalonia; later, the Spanish Association of Maize Producers also reported its detection in Navarra (AGPME, 2014).

In November 2014, the Spanish MEP Marina Albiol Guzmán submitted a written question to the European Commission regarding the detected damaging teosinte populations in Spain. In its reply, the Commission stated that “*the Commission has no data on the appearance of teosinte.*”² Consequently, the teosinte plants were not included in the preliminary list of invasive species of Union concern pursuant to Regulation (EU) No 1143/2014, published by the Commission in 2015.³ To our knowledge, it appears that no formal alert nor information were issued by the Spanish authorities to the EU or by the EU or Spain to other countries, including at minimum French, Portuguese and Italian agricultural authorities, and the respective EU authorities. We find this highly surprising and negligent since the spreading of teosinte populations already seriously affects the maize production systems in Spain and might do likewise in neighbouring countries. As far as we know, to date only the Government of Aragon has issued at least a technical advisory informing and instructing maize farmers about this serious novel weed in Spain (Government of Aragon, 2014). In Aragon, the situation has deteriorated to the point that the provincial government felt compelled to issue and enact a ban on maize production in the affected fields, in a region where this is the main source of income for

¹ www.agri79.com/actualites/teosinte-la-teosinte-exige-une-vigilance-touteparticuliere%26fldSearch=arvalis:JFNK3KKU.html

² www.europarl.europa.eu/sides/getAllAnswers.do?reference=E-2014-008766&language=EN

³ <http://ec.europa.eu/transparency/regcomitology/index.cfm?do=search.documentdetail&R9HrcEYe4trO+25Okz6MGrVuD/qT+00S/ETod9Zc7XVqHZGdlwy2rS97ztb5t8b>

the farmers. In Catalonia, the authorities are now just beginning to inform farmers.

Furthermore, these teosinte populations are likely recipients for transgenic DNA stemming from genetically modified maize MON810, widely cultivated in these regions. Gene flow may endow these teosintes with a powerful defense mechanism against potential herbivores. Given the quality of the gene expressed in MON810 - a Bt toxin with insecticidal properties - the hybrids between maize and teosinte are likely to show higher fitness compared to the native teosinte plants. In any case, the producer of MON810 and applicant company Monsanto should have included this information into its annual monitoring reports, as it is legally obliged to. However, to our knowledge, no such information was made available by Monsanto, nor any measure taken or proposed to control this serious situation.⁴

In the light of these observations, we urge you to:

- immediately start investigations on the ongoing spread of teosinte in Spain (including point of entry, introduced species of teosinte, ecology of introduced teosinte, etc.)
- take measures to inform farmers in Spain, France, Italy and Portugal about the teosinte and its destructive potential
- initiate measures to stop further spreading and new introductions
- take measures to stop the cultivation of MON810 in Spain
- withdraw the authorisation for cultivation of MON810 GM maize in the EU, since the responsible company has repeatedly failed to perform a proper monitoring and to detect the massive infestation of maize production areas in Spain with teosinte, as requested by the EU legislation (Directive 2001/18/EC).

Yours sincerely,

Amigos de la Tierra, Andalucía
Libre de Transgénicos Plataforma
CECU - Confederación de Consumidores y Usuarios
COAG - Coordinadora de Organizaciones de Agricultores y Ganaderos
Ecologistas en Acción
Ecovalia
Foundation on Future Farming
IFOAM EU
Red de Semillas "Resembrando e Intercambiando"
Save our Seeds
SEAE - Sociedad Española de Agricultura Ecológica
Testbiotech
The Software AG Foundation

For further correspondence, please contact:

María Carrascosa, Red de Semillas "Resembrando e Intercambiando", <maria_carrascosa@riseup.net>
Eric Gall, IFOAM EU, <eric.gall@ifoam-eu.org>
Blanca Ruibal, Amigos de la Tierra, <agricultura1@tierra.org>
Christoph Then, Testbiotech, <christoph.then@testbiotech.org>

References:

AGPME, 2014. El teosinte. http://www.agpme.es/index.php?option=com_content&view=article&id=181:el-teosinte&catid=44:articulos&Itemid=68

Government of Aragon, 2014. El teosinte (*Zea mays* spp). Informaciones técnicas 4/2014. Centro de Sanidad y Certificación Vegetal. Dirección General de Alimentación y Fomento Agroalimentario. Government of Aragon, 2015. Teosinte en maíz. Situación actual y medidas de erradicación. <http://www.genvce.org/informacion-externa/varios/>

Parliament of Aragon, 2014. Pregunta núm. 1206/14, relativa a la introducción del teosinte. <http://bases.cortesaragon.es/bases%5Cboca2.nsf/%28BOCAID%29/9FEAD60ED93C4011C12577D9A004D7967?OpenDocument>

⁴ http://ec.europa.eu/food/plant/docs/plant_gmo_report_studies_report_2014_mon_810_en.pdf