Testbiotech e. V.
Institute for Independent Impact Assessment in Biotechnology

Frohschammerstraße 14
80807 München
Germany

Phone
0049(0) 15154638040
info@testbiotech.org
www.testbiotech.org

Executive Director:
Dr Christoph Then

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European Commissioner for Health & Food Safety
Ms Stella Kyriakides

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Time to end cultivation of GE maize MON810

Dear Commissioner Kyriakides,

we became aware of new data on outcrossing of transgenes of maize MON810 into wild species teosinte. The research (Arias-Martin et al., 2024) was carried out in Spain by the state research institute INIA-CSIC (Centro Nacional Instituto de Investigación y Tecnología Agraria y Alimentaria). The scientists showed that under field conditions there is a high probability that the GE maize will cross with teosinte, and thereby transfer the transgene for the insecticide to the wild plants. These hybrid offspring grow taller and flower earlier in comparison to teosinte, thus increasing the probability of spread in the environment.

In addition, we would like to bring to your attention previous publications that also show crossing between MON810 and teosinte that were published 2019 (Arias-Martin et al., 2019) and 2022 (Arias-Martin et al., 2022).

We were following the annual reports of the European Food Safety Authority (EFSA) on monitoring of MON810, but could not find any mentioning of these quite substantial findings. We have to assume that

- Bayer violated its obligation for reporting new findings that may put into question the safety of MON810 in the EU;
- Spain did not make notice of this new findings to the EU institutions, even though teosinte is classified as an invasive species;
- EFSA, despite required by the Commission to assess the risks of crossings between teosinte and MON810, was not able to be up-to-date with the latest facts and findings.

Against this background, we call on you to take action to halt the cultivation of MON810 in the EU for 2024.

The appearance of teosinte was first observed in Spain in 2014. It originated in Mexico and is considered to be a wild relative of maize. The spread of teosinte in Spain has led to crop losses, as the teosinte plants are often only detected in the fields at harvest time. Testbiotech called on the European Commission as early as 2016 to stop the cultivation of the GE maize in the affected regions to prevent the uncontrolled spread of the transgenes. There are reports that teosinte already has acquired herbicide resistance from previous crossings in other regions.

Furthermore, there are other reasons to end the cultivation of MON810: EFSA recently expressed concern about signs of resistance developing in insects (European corn borer) in Spain, which the GE maize is intended to combat (EFSA, 2023). At the same time, EFSA is criticizing the company for several deficiencies in monitoring the development of resistance in target insects.

The authorisation for cultivation of MON810 was issued in 1998 and expired after ten years. Since then, there has been neither a renewal of the authorisation nor a ban on cultivation. The existing EFSA opinions on cultivation of MON810 are outdated. For example, EFSA has developed a new model for the assessment of risks for non-target butterflies (Baudrot et al., 2021). However, the model was not applied to update the EFSA opinion. Since 2008, the maize could only be cultivated because the EU Commission has granted a provisional extension. While an official authorisation for cultivation of GE maize ends after 10 years, this provisional extension is now valid for around 17 years. All in all, we consider this as a severe case of maladministration by the EU Commission which is responsible for the approval procedures.

The cultivation of GE maize in Spain has fallen sharply in recent years. While around 140,000 hectares were still being cultivated in Spain in 2014, this figure has now fallen to less than 50,000 hectares. Besides Spain, the maize is also cultivated in Portugal, albeit on a much smaller area and also with a clear downward trend.

It is now time to stop the cultivation of MON810 in the EU completely to avoid the occurrence of populations of insecticidal, transgenic hybrid teosinte plants with an increased tendency to persist and spread in the environment.

Since the period for sowing of maize has started, we would be happy to receive your answer within the next 14 days.

With kind regards

Christoph Then, Testbiotech
Executive director
info@testbiotech.org
Tel +49 151 54638040

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