

**This is the information you have filled in the request for
EFSA Scientific Opinion on the assessment of genetically modified maize Bt11 x MIR162 x
MIR604 x 1507 x 5307 x GA21 and subcombinations, for food and feed uses.**

Do not reply to this message, the sender address does not accept any incoming email.

1. Name : Miep Bos, spokeswoman
Organisation : The European GMO-free Citizens (De Gentechvrije Burgers)
Organisation type :Others...
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Public : Yes

b. Food Safety Assessment:

*** Toxicology**

Some Links to Cancer Shown in Draft Review of Common Pesticide

Posted April 8, 2019, 9:50 PM

On April 8, the Agency for Toxic Substances and Disease Registry, (ATSDR), part of the Department of Health and Human Services, released a long-awaited draft toxicological profile of glyphosate, the active ingredient found in Roundup weedkillers.

<https://news.bloombergenvironment.com/environment-and-energy/some-links-to-cancer-shown-in-draft-review-of-common-pesticide>

Details

Published: 12 October 2018

A new study has found that some of the world's most widely used herbicides, Roundup (glyphosate) and Kamba (dicamba), increase the rate of antibiotic resistance development in bacteria by a factor of up to 100,000 times faster than occurs without the herbicide.

<https://www.gmwatch.org/en/news/latest-news/18508-glyphosate-and-dicamba-herbicides-increase-antibiotic-resistance-in-bacteria>

In any case, both the EU pesticide regulation and the GMO regulation require a high level of protection for health and the environment. Thus, in regard to herbicideresistant plants, specific assessment of residues from spraying with complementary herbicides must be considered to be a prerequisite for granting authorisation. In addition, cumulative effects have to be investigated if a plant contains or produces other compounds with potential toxicity.

Kleter, G.A., Unsworth, J.B., Harris, C.A. (2011) The impact of altered herbicide residues in transgenic herbicide-resistant crops on standard setting for herbicide residues. Pest Management Science, 67(10): 1193-1210.

Kraemer, L. (2012) The consumption of genetically modified plants and the potential presence of herbicide residues, legal dossier compiled on behalf of Testbiotech,

http://www.testbiotech.de/sites/default/files/Legal_Dossier_Kraemer_Pesticide_RA_PMP.pdf

Kramarz.

*** Allergenicity**

Monsanto pressured Wallace Hayes, Editor of Food and Chemical Toxicology Journal to retract the famous Séralini study, which discovered the damage caused by GM maize NK603.

<http://sustainablepulse.com/2017/08/01/monsanto-secret-documents-show-massive-attack-onseralini-study/#.WYnDNbpuKU> <https://usrtk.org/wp-content/uploads/2017/08/10-Monsanto-Consulting-Agreement-with-Food-and-Chemical-Toxicology-Editor.pdf>

4. Conclusions and recommendations As the emails of Monsanto employees that appeared during the court cases show that misleading is commonplace, and that prof. Séralini has it right with his research, we can only conclude these toxic GM maize should not enter the European market! !

<https://www.facebook.com/GmoSeralini/> Monsanto Secret Documents Show Massive Attack on Seralini Study . In secret internal Monsanto documents released on Tuesday 1st August 2017 by legal firms in the U.S. it was made clear how Monsanto successfully pressured Wallace Hayes, Editor of Food and Chemical Toxicology Journal to retract the famous Séralini study which discovered the damage caused by GM maize NK603 and low doses of Roundup herbicide.

<https://www.baumhedlundlaw.com/toxic-tort-law/monsantoroundup-lawsuit/monsanto-secret-documents/>

Herbicide-resistant plants are meant to survive the application of the complementary herbicide while most other plants will die after short time. Thus, for example, residues of glyphosate, its metabolites and additives to the formulated product might accumulate and interact in the plants. As the publication by Kleter et al. (2011) shows, using herbicides to spray genetically engineered herbicide-resistant plants does indeed lead to patterns of residues and exposure that need to be assessed in detail. According to a reasoned legal opinion drawn up by Kraemer (2012), residues from spraying with complementary herbicides have to be taken into account in the risk assessment of genetically engineered plants from a regulatory point of view.

In any case, both the EU pesticide regulation and the GMO regulation require a high level of protection for health and the environment. Thus, in regard to herbicideresistant plants, specific assessment of residues from spraying with complementary herbicides must be considered to be a prerequisite for granting authorisation. In addition, cumulative effects have to be investigated if a plant contains or produces other compounds with potential toxicity.

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http://www.testbiotech.de/sites/default/files/Legal_Dossier_Kraemer_Pesticide_RA_PMP.pdf

Kramarz.

*** Nutritional assessment**

You should have requested that Monsanto submit data from field trials with the highest dosage of glyphosate that can be tolerated by the plants, also including repeated spraying. The material derived from those plants should have been assessed in regard to organ toxicity, immune reactions and reproductive toxicity, also taking combinatorial effects with other plants components and the Bt toxins into account. In the context of risk assessment of this stacked event, the residues from spraying with the complementary residues must also considered to be a potent co-stressor. The impact on cells and organisms exposed to several stressors in parallel can be of great importance for the efficacy of Bt toxins. As, for example, Kramarz et al. (2007 and 2009) show, parallel exposure to chemical toxins can lead to Bt toxins having an effect on organisms that are not normally susceptible. In addition, Bøhn et al. (2016) show additive effects of several Cry toxins. Cry toxins interact with Roundup / glyphosate when co-exposed to *Daphnia magna*. These cumulative effects also have to be assessed in regard to food and feed usages.

* Others

3. Environmental risk assessment

You should have requested that Monsanto submit data from field trials with the highest dosage of glyphosate that can be tolerated by the plants, also including repeated spraying. The material derived from those plants should have been assessed in regard to organ toxicity, immune reactions and reproductive toxicity, also taking combinatorial effects with other plants components and the Bt toxins into account. In the context of risk assessment of this stacked event, the residues from spraying with the complementary residues must also be considered to be a potent co-stressor. The impact on cells and organisms exposed to several stressors in parallel can be of great importance for the efficacy of Bt toxins. As, for example, Kramarz et al. (2007 and 2009) show, parallel exposure to chemical toxins can lead to Bt toxins having an effect on organisms that are not normally susceptible. In addition, Bøhn et al. (2016) show additive effects of several Cry toxins. Cry toxins interact with Roundup / glyphosate when co-exposed to *Daphnia magna*. These cumulative effects also have to be assessed in regard to food and feed usages.

4. Conclusions and recommendations

We zijn het eens met de kritische opmerkingen van lidstaten Oostenrijk, Duitsland, Noorwegen, Italië en Hongarije. U dient deze opmerkingen als herhaald en ingelast bij onze commentaren te beschouwen. De landen zorgen er voor dat hun volk niet ziek zal worden van deze zeer giftige mais! **We schamen ons er voor dat Nederland geen enkel gevaar voor de volksgezondheid, dierenwelzijn en milieu verwacht. En altijd maar verwacht dat alles "verwaarloosbaar klein is". Schande! Zij schrijft op blz. 40:**

"The Dutch CA has assessed the dossier with respect to the environmental, food and feed safety of Bt11 x MIR162 x MIR604 x 1507 x 5307 x GA21 maize and has no comments or requests for additional information in relation to the safety of this GM." Bron: opinie van lidstaten. Overall opinion of the European Food Safety Authority on genetically modified maize Bt11 x MIR162 x MIR604 x 1507 x 5307 x GA21 and sub-combinations for food and feed uses, import and processing under Regulation (EC) No 1829/2003 (application EFSA-GMO-DE-2011-103). EFSA supporting publication 2019:EN-1617. 7 pp. doi:10.2903/sp.efsa.2019.EN-1617
ISSN: 2397-8325

Deze giftige mais mag niet op de markt komen en we zullen er alles aan doen dit niet te eten. We blijven gezond met biologisch voedsel. Ons commentaar is ook gedaan namens Stichting Ekopark in Lelystad en wordt ondersteund door Stichting Natuurwetmoeders in Bussum.

6. Labelling proposal

Mag niet op de EU markt komen!