

# **Comments by GeneWatch UK to 2001/18/EC marketing application reference C/NL/04/01.**

(November 2004)

The comments made here do not cover the human food and animal feed safety issues as this is not fully covered by the Directive 2001/18/EC.

## **1) Scope of the application**

The application was initially submitted to cover the full range of uses for cottonseed. However the implementation of the new regulation (EC) 1829/2003 this application was restricted to just import and industrial use. The applicant states that there will, in due course be an application under 1829/2003. However it does not appear that there has yet been an application. The Netherlands competent authority has assessed the application without taking into account food and feed safety aspects. In theory, the applicant could start importing this cotton seed line as soon as authorisation under 2001/18/EC is given even though no authorisation is given for food or feed use. GeneWatch UK is concerned that there is no restriction in the recommendations of The Netherlands to only allow import of this cotton line once it has received clearance under 1829/2003.

## **2) Spillage near cotton fields**

GeneWatch is concerned about the spillage of seed, from trucks transporting imported GM cottonseed, to verges and nearby fields. Whilst it is recognised that Cotton seed is unlikely to survive any EU winter, there is a chance that it will mix with cotton growing in arable fields. If a farmer is saving seed and planting on the same farm every year and trucks are coming past spilling seed each year then significant contamination may take place.

This is specifically the case with Greece and to a lesser extent Spain as they are the only countries to grow any significant amounts of cotton in the EU. Greece is also the EU's largest cotton importer taking 42% of all cotton imports in 2002.

In the e.r.a. it states that Greece has not imported cotton from the USA in recent years. However, the application is not restricted to cotton line 281-24-236/3006-210-23 grown only in the USA.

GeneWatch believes that the application should take account of this situation in the e.r.a a set up appropriate monitoring and liability regimes.