

March 2014

To:

The Hon'ble Chief Minister,  
Government of Maharashtra

AND

The Hon'ble Minister for Agriculture  
Government of Maharashtra  
Mantralaya, Mumbai

Dear Sirs,

**Sub: Request for halt to any open air trials of GMOs in Maharashtra**

We are deeply concerned that 28 applications for open air field trials of transgenic (GM) crops have been approved in the state of Maharashtra. This clearance has taken place despite the Supreme Court's Technical Expert Committee (TEC) having recommended a moratorium on Bt (GM) in food crops until long term safety is clearly established, and a total ban on herbicide tolerant GM crops and those for which India is a centre of origin or diversity. In 2012 a Joint Parliamentary Committee (JPC) on Agriculture, had also unanimously called for a moratorium on GM field trials. Yet Maharashtra is one of only 3 States to have granted clearance for GM crop field trials. This includes foods like rice, wheat, maize and brinjal. We urge you to cancel these clearances for reasons given herein.

GM is projected as 'scientific' and opposition to it as 'unscientific', echoing agri biotech corporations claims that India will be 'left behind' if it does not adopt this 'modern' and 'scientific' technology. Let us look at facts. Only 5 countries – USA, Brazil, Argentina, India and Canada - account for 90% of area under GM. A majority of 'modern' countries – including Europe, Japan, Russia, Korea etc - reject or severely regulate GM crops. Even China plants less GM area than India. These countries have assessed claimed GM benefits against risks to health, environment, farmer livelihoods, seed diversity and national seed sovereignty. Farmers and consumers in Maharashtra are being subjected to a highly controversial technology by decisions taken in secrecy by a small committee, headed by a nuclear scientist and selected agricultural scientists.

Health and environment safety are major issues for GM, yet the Kakodkar Committee did not transparently call for and consider biosafety inputs. Unlike experiments in physics and chemistry, open air biological experimentation involves highly complex living organisms and ecosystems. Consequences are neither predictable nor reversible and, in the case of GM, are potentially hazardous.

1. **There are over 400 peer reviewed scientific studies of which abstracts are documented in the book titled "Adverse Impacts of Transgenic Crops/ Foods"** sent herewith. Many studies are from highly reputed scientists and institutes. Such independent research, unlike corporate funded research, indicates possible linkages between GM and cancer, kidney and liver dysfunction, allergies, asthma, obesity

.and other illnesses. Around 99% of GM in crops is either to insert a toxin producing gene or a herbicide tolerating gene into seeds, and thereby into every cell of the plant. Over 90% of corn and soya in USA is GM. US consumers are now demanding labeling of GM due to suspected linkages with increased sickness. Health impacts take long to manifest – as in the case of tobacco – so extreme caution on GM food is warranted.

2. **There is no crisis that demands any hasty decision. India has sufficient food grain stocks, much of it rotting or exported.** Affordable access, not yield, is our real problem. The Union of Concerned Scientists studied 13 years of crop yields in USA and found no significant increase in yield of any GM crops. In USA, after 17 years of being the largest planter of GM crops, food insecurity has not ended. Food insecurity increased from 12% in 1995 to 15% of the US population in 2011.
3. **Billions of dollars of subsidies in USA prop up just 2% of the population who are in agriculture. Over half goes for GM crops. Bt cotton has not significantly increased yield.** There is much propaganda about how Bt cotton has increased production – without indicating increases in area and irrigation. Cotton Advisory Board data shows that most of the yield increase in cotton took place before 2005, when Bt cotton was less than 6% of the cotton area (270 kg/ha to 470kg/ha). Yield increased only slightly from 2005 to 2012 (480 kg/ha) when 90% of area was Bt.
4. **Bt cotton has not decreased suicides.** In 2012 two thirds of suicides were in cotton growing states. Maharashtra has 90% cotton area under Bt cotton, and the highest suicides, with a 13% increase in 2012. Bt cotton seed is expensive and is water and input intensive. Farmers are trapped between high indebtedness and monsoon failures, leading to suicides and huge loan waivers at taxpayers cost. The Kakodkar Committee did not examine why organic cotton growers do not commit suicide.
5. **The largest global study on agricultural science and technology is the IAASTD Study, by 400 scientists appointed by World Bank, FAO, WHO and other UN Agencies.** It unanimously concluded that ecological farming by small farmers, and not GM, can best increase food security. India is one of over 80 countries that adopted these findings in 2008, and it is time to promote this rather than GM.
6. **An ASSOCHAM study for West Bengal showed that organic farming could lead to wealth accumulation of Rs 120 billion, generate exports worth Rs 5.5 billion, provide 30% more jobs per hectare and increase net per capita income of farmers by 250% in 5 years.** It also frees consumers from toxic food and the nation from dependency on corporate monopolies which eventually destroy their seed diversity. Maharashtra should promote this, rather than GM agriculture.
7. **GM and organic farming cannot co-exist for long as contamination by pollination, seed mixture etc takes place. GM will result in loss of exports.** Agricultural Universities are the repositories of India's seed wealth created by generations of Indian farmers. Seed trials are not innocuous and if done in their campuses or in farmers fields, will expose other seeds to risk. US farmers suffered millions of dollars

in losses due to importers rejecting rice and wheat which had been inadvertently contaminated after field trials of rice and wheat.

**8. Total pesticide use has not decreased in Maharashtra and now Bt cotton seed oil is mixed in cooking oil, with no monitoring of long term effects on health.**

**The first step before clearing GM field trials should have been a transparent and open debate on NEED for GM in any of these crops. GM adoption is a major and irreversible change in food and farming. This is not a matter for a small committee of a few scientists to decide through closed door deliberations.** In the case of Bt brinjal, public hearings led to a wealth of information becoming publicly available. The moratorium on Bt brinjal by Mr Jairam Ramesh has been endorsed by the TEC and the JPC. Mr Moily's haste in giving in principle approvals to GM field trials for a reported 200 crop varieties and the Kakodkar Committee's secret deliberations giving clearances for 28 field trials in Maharashtra, may have brought great joy to biotech corporates, but not to other citizens..

**Every citizen and every farmer must have the right to be free of GM if they wish.** The Secretary Agriculture, GOI, admitted to the Technical Expert Committee of the Supreme Court that it will not be possible to segregate GM from non GM crops. The Maharashtra Government is unable to enforce even the regulations it had laid down for refuge areas for Bt cotton. How will citizens' rights – consumers and farmers - to be free of GM be guaranteed? Until there is a convincing answer to this, there is no justification for hastening GM field trials.

**Most other State Governments have not given approvals for GM field trials. Some have forthrightly opposed GM for the reasons given above. We urge an immediate cancellation of any clearances given for field trials of GM crops in Maharashtra. In fact, strict monitoring and strong punitive action for any illegal GM planting is what is expected and required from the Government.**

Sincerely,

Letter signed by;

Organizations

1) AGNI (Action for good governance and networking in India ) – A citizen movement for good governance.

2) Alliance for Sustainable and Holistic Agriculture (ASHA): A large, nation-wide, informal network of more than 400 organizations working towards sustainable agriculture.

3) Avaaz - A global civic organization to bring people-powered politics to decision-making everywhere.

4) Bombay Natural History Society (BNHS) - One of India's leading environmental organizations engaged in conservation and biodiversity research

- 5) Council for Fair Business Practices - An organization of businessmen and professionals promoting fair business practices among companies and protecting the interest of consumers.
- 6) Indian Trust for Rural Heritage and Development (ITRHD) - A pan India organization working to ensure sustainable economic growth to rural communities in their traditional habitats.
- 7) Hamara Beej Abhiyan - A movement to revert to indigenous seeds, putting farmers in charge of agriculture by replacing chemical intensive farming with ecology friendly alternatives
- 8) Kalpavriksh - A non-profit organization working on environmental and social issues.
- 9) SRUTI - Society for Rural Urban and Tribal Initiative: A non-profit organization that works towards social change at the grass roots across rural and urban India
- 10) V Citizens Action Network - An organisation dealing with citizens rights with particular focus on systems change in governance.
- 11) Yusuf Meherally Centre - An organization working towards rural development

#### Individuals

- 1) Justice Sujata Manohar - Former Judge, Supreme Court of India, Chief Justice of Bombay and Kerala High Courts, and Member, National Human Rights Commission
- 2) Justice M B Shah - Former Judge Supreme Court of India , Chief Justice of Bombay High Court and President National Consumer Disputes Redressal Commission
- 3) Justice S N Variava - Former Judge Supreme Court of India and Chief Justice of Delhi High Court
- 4) Justice B N Srikrishna - Former Judge, Supreme Court of India and Chief Justice of Kerala High Court
- 5) Padma Bhushan Mr. Julio Ribeiro – Former Police Commissioner of Mumbai, DG Police of Gujrat , Secretary Home Ministry and Ambassador to Romania
- 6) Dr S K Misra: Former Secretary Agriculture, Govt of India and Principal Secretary to the Prime Minister of India
- 7) Prof Armaity S Desai - Former Chairperson, University Grants Commission and Director, Tata Institute of Social Studies
- 8) Mr. Shailesh Gandhi - Former Central Information Commissioner and well known RTI activist

