

Mr. Vijai Sharma
Secretary
Ministry of Environment & Forests
Room No.407, Paryavaran Bhawan
CGO Complex, Lodhi Road
New Delhi 110003

Dear Sharmaji,

We are writing to you regarding an issue of concern. Please see the enclosed *Down To Earth* story entitled '**Test Tube Brinjal**' (page nos. 29-34). ***The story is on Bt brinjal, which is under consideration for commercial cultivation in India and awaiting approval from the GEAC.*** My colleagues who have investigated this story find areas of concern, which will require very careful and considered decision-making. The key issues they explain are:

1. The Bt brinjal will be one of the few edible genetically modified foods, which are used for human consumption directly and not processed into bread or used in other processed foods. We therefore, need to be extremely precautionary in our review of this food.
2. This is combined with the fact that as yet, there is no labeling for genetically modified foods, which will then give consumers, like me or others, who do not want to ingest this food a choice. This is critical and even more so, as other genetically modified food crops are on the anvil for clearance.
3. It is also clear that labeling of GM-food will require a strengthened laboratory and regulatory framework. Currently it is not possible to check the GM-content in our food and this analysis, if done, is rarely made available. We had ourselves tried to get edible oil tested for GM, but in spite of all our efforts, were unable to find a laboratory, which would test in the public interest. The country's eminent food scientists also told us in no uncertain terms that testing for GM in food is not easy or cheap. If this is the case, then it becomes even more important for us to be cautious in clearing an edible crop, which then cannot be tested easily to check if it is GM or not.

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4. The fact that this is an edible crop, it will become, even more important to ensure that there is no contamination of non-GM crops. We understand that the procedures to guard against contamination have been laid down by India's regulatory authorities. But you will also agree that the implementation of these procedures, in the farms and fields of the country are a challenge.
5. In all this, it is clear that we will need a greatly enhanced regulatory system. Currently, all research is funded by companies and then presented to the regulators for clearance. It is not surprising then that there is an enormous lack of credibility in the scientific integrity of this research. In the case of Bt-brinjal my colleagues have reported two studies, which dispute the scientific basis of the research submitted by the proponent company. It is important that research done on our food is in the public interest and so is publicly funded. It is necessary for us to evolve a system of payment or cess on the biotech companies, to pay for this research.
6. Similarly, it is important to use this GM-regulatory cess, to set up a network of analytical laboratories across the country to check for consumer safety. Setting up these laboratories in the public domain is critical. Consumers must have the right to be able to get their food checked for GM.

We hope you will take these issues into consideration, while taking the decision on this edible crop.

With best wishes,

Yours cordially,

Sunita Narain