

## OPEN LETTER TO

THE EUROPEAN FEDERATION OF BIOTECHNOLOGY

PUBLIC RESEARCH & REGULATION INITIATIVE

ASSOCIATION FRANÇAISE POUR L'INFORMATION SCIENTIFIQUE (AFIS)

Dear colleagues,

Dear friends.

I appreciate very much the steps you are taking to push the EU politics in biotechnology near to rational basis.

However, I am convinced that it is our duty to use any opportunity to stress the fact that this politics, this regulation, is **basically in contradiction to science** with no regard how the attributes are improved in details.

EU politics is based on two paradigms:

- 1) The risk follows from the way how new organisms (crop varieties) were obtained;
- 2) Out of all possible techniques of breeding only transgenesis generates health and ecology risks and has to be regulated more strictly than dangerous chemicals; all other techniques are safe and resulting organisms need no regulation.

Neither of them is based on science.

a) It is obvious that other breeding methods may produce risk to health. By definition and by law any new variety must provide at least one new stable and uniform trait, i.e. new gene, new gene product. The study by Batista et al (PNAS 105, March. 4, 2008, p. 3640-3645.) clearly documented that radiation mutation generates twice as much novel proteins than transgenesis.

b) It is also obvious that, e.g. the halotolerant rice mutant developed by radiation and grown on hundreds of thousands hectares in Asia represents higher risk to native ecosystem than Bt maize in Europe.

c) Existing ("traditional" or "conventional") agriculture is automatically regarded as "zero risk" and all risk is due solely to the introduction of GM crops. E.g., French regulators are concerned about the possible impact of Bt toxin on non-target organisms, but they do not assess the ecology impact of measures taken by farmers (who in 2007 used Bt maize on more than 20 000 ha) to control pests when Bt variety is not available.

It is clear that the EU would not change the established biotechnology regulation easily, as it provides political power and additional profit due to regretful misinformation of public (Eurobarometer 2005). However such targets must not be sheltered by science. We have to proceed step-by step. **But as scientists we are obliged to declare that our involvement in correction of practical details of EU regulation does not mean we accept the anti-scientific basis of it and thoroughly oppose politicians in calling the regulation “science-based”.**

15 June 2008

Jaroslav Drobnik

Professor (emeritus) of biophysics

Dep. of Microbiology and Genetics, Faculty of Science

Charles University

Viničná 5

128 44 Praha 2

Czech Republic

[j.drobnik@atlas.cz](mailto:j.drobnik@atlas.cz)