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KENMERK CGM/120521-01
ONDERWERP Advice on General Surveillance concerning import of GT73 oilseed rape

Dear Sir,

In February 2012, COGEM advised on the market application for import and processing of glyphosate resistant and tolerant oilseed rape GT73.[1] COGEM concluded that import and processing of this line poses negligible risks to the environment. However, a post-market monitoring plan completing the application was absent. EFSA has now made this plan available for comments by the member states.

General surveillance has been introduced to be able to observe unexpected adverse effects of genetically modified (GM) crops on the environment. In general, the setting or population in which these effects might occur is either not, or hardly predictable. General surveillance for GT73 oilseed rape focuses on the import, handling and processing of viable GT73 oilseed rape.

Oilseed rape is known for its ability to form volunteers in disturbed environments like roadsides or along railway tracks. Modern oilseed rape varieties, which have a low erucic acid content, have been found to form volunteer populations less often. In the Netherlands, glyphosate application is the most commonly used method of weed control along railway tracks. If glyphosate is used for weed control, spilled GM oilseed rape will have a selective advantage over other plants and may be able to form small volunteer populations. These populations of glyphosate tolerant oilseed rape may be controlled by other herbicides, flame weeding or steam weeding. However, the establishment of small volunteer populations of spilled GT73 in disturbed environments where glyphosate is frequently applied cannot be excluded.

Cross-fertilisation of GM oilseed rape volunteers could lead to stacking of different traits. Although COGEM does not consider stacking of traits from currently authorised GM oilseed rape varieties an environmental risk,[1] it is important to know whether stacked events arise. This will allow future risk assessments to take the putative presence of stacked oilseed rape events into account.

1. COGEM (2012). Advice on import and processing of GT73 oilseed rape. Advice CGM/120203-01

EFSA has stated in its guidance document that monitoring plans should address relevant exposure pathways.[2] Given the considerations above, COGEM points out that in the monitoring plan for GT73 not all relevant exposure pathways for monitoring of GM oilseed rape are included. In 2010, COGEM remarked that general surveillance for crops that have outcrossing potential should cover handling areas and distribution routes.[3] In the Netherlands, populations of oilseed rape have been observed on several occasions near roads, railway tracks and railway stations.[4,5] Therefore, monitoring should pay special attention to these areas where viable oilseed rape seeds could be spilled unintentionally.

Also, since glyphosate application is the most common method of weed control along railway tracks in the Netherlands, railway companies and/or companies in charge of the maintenance of railway tracks (such as ProRail in the Netherlands) should be enlisted by the authorisation holder to monitor the occurrence of GM oilseed rape along railway tracks.

In 2010, COGEM formulated compliance criteria for General surveillance (GS) plans concerning Dutch applications for import and cultivation of GM crops. In addition to the criteria mentioned above, the two following criteria are applicable to the GS plan of GT73 oilseed rape.

In the EFSA guidance document, EFSA states that raw data and analysis of monitoring data should be made available by the applicant to the Competent Authorities and the European Commission.[2] COGEM agrees with this request and points out that the GS plan of GT73 oilseed rape could be improved by a statement of the applicant on this point.[6]

The PMEM plan states that if the authorisation holder identifies an unexpected adverse effect caused by the GM plant, he will inform the European Commission immediately. COGEM is of the opinion that Member States should also be directly informed of these effects by the authorisation holder, to ensure that appropriate measures for protection of humans and the environment can be implemented immediately.

COGEM concludes that the GS plan for import and processing of GT73 oilseed rape could be improved on several points. Most importantly, COGEM advises to include in the General surveillance plan that roadsides and railway beddings near oilseed rape transhipment and transport sites will be monitored for spillage of GM oilseed rape and stacking of event GT73.

Sincerely yours,

Prof. dr. ir. Bastiaan C.J. Zoeteman
Chair COGEM

2. EFSA Panel on Genetically Modified Organisms (2011). Guidance on the Post-Market Environmental Monitoring (PMEM) of genetically modified plants. EFSA Journal 9:2316
3. COGEM (2010). General Surveillance. Topic report CGM/100226-01
4. Tamis WLM & De Jong TJ (2009). Transport chains and seed spillage of potential GM crops with wild relatives in the Netherlands. COGEM Report: CGM 2010-02
5. Luijten SH & De Jong TJ (2010). A baseline study of the distribution and morphology of *Brassica napus* L. and *Brassica rapa* L. in the Netherlands. COGEM Report: CGM 2010-03
6. COGEM (2011). Advies m.b.t het concept van de herziene 'Guidance on the Post-Market Environmental Monitoring (PMEM) of GM plants' van de EFSA. Advice CGM/110520-01

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