



Consejo Nacional Agropecuario
Comisión de Biotecnología Agroalimentaria

In response to the call for opinions on the draft document *Maize and Biodiversity: The Effects of Transgenic Maize in Mexico*, the Agroalimentary Biotechnology Commission (*Comisión de Biotecnología Agroalimentaria*) of the National Farm Council (*Consejo Nacional Agropecuario—CNA*), after carefully reading the documents published on the web page and attended the symposium held in Oaxaca last month, offers the following comments that, in addition to commenting on some of the core topics, seeks to reduce the level of disinformation generated by the release of unfounded arguments on the phenomenon at hand.

First, we believe that it is essential for the CEC Advisory Committee to maintain its original commitment to make objective, honest, balanced and scientifically supported recommendations, since we have been greatly concerned to see ideological judgments prevail at the symposium, to the point that attendees were no longer paying attention to the speakers' topics and the discussion period was used for reading previously prepared documents, with no correlation to the problem analyzed at the time.

Furthermore, it is important that these recommendations give priority to address the need clearly expressed during the symposium, to establish a mechanism that provides reliable information on what genetically improved maize is and what it really represents for the inhabitants of regions where landrace materials are grown. The priorities in the release of information should consider the concerns expressed by the attendees with regard to the safety of biotechnology product consumption. In this sense, it is essential to recognize that the genetically modified maize currently on the market has passed the evaluation by regulatory bodies, which have determined the innocuity thereof with exhaustive, detailed scientific studies evidenced by multiple reports. Mexico's case is clear, considering the list of authorizations granted by the Secretariat of Health (*Secretaría de Salud*) pursuant to the General Health Law (*Ley General de Salud*) with reference to biotechnology products. Who benefits from hiding this fact? What do the country and the populace of Oaxaca gain with false and misleading information with respect to the health risks of products approved for consumption, the innocuity of which has been proven? The CEC Advisory Group members' lack of attention to this concern during the meeting has only contributed to reinforcing the fears expressed, far from helping to provide scientific and official information.

Also at the symposium Dr. Amanda Gálvez Mariscal, coordinator of the CIBIOGEM Advisory Board, presented the results of studies on the presence of elements of genetically improved materials in landrace maize collected in the states of Puebla and Oaxaca, requested by the Mexican government. These results clearly show the notable decrease of positive tests throughout the different crop cycles, from which it may be inferred that such characteristics are not fixed in such populations. This confirms the opinion of renowned scientists in Mexico and other countries that the simple presence of material from genetically improved maize **does not represent a threat to landrace maize breeds** (this was highlighted by Dr. Berthaud at the symposium). In fact, it is widely known that landrace maize exchanges genes with different materials, including maize improved by conventional techniques. The grower himself selects the desirable attributes for his subsequent crops, with respect to tastes, consumer preferences and performance, dynamically maintaining their distinctive characteristics.

The symposium demonstrated the maize's relevance in Mexico, and the need to assess each and every technological option so that production ensures the required supply. This evaluation should consider the benefits and costs of each alternative as a whole, contemplating all links on the value chain. It appears to us to be irresponsible to have proposals geared at prohibiting the import of genetically improved maize, in favor of flour, with the argument that flour cannot be planted, and thereby inhibits gene flow. This measure would worsen the broken agroindustrial chains in the country, with devastating effects to employment and harmful socioeconomic effects, particularly for the development of the nation's farm sector. It would also increase the importation of processed end products, losing the opportunity to generate added value in Mexico.

There should be attention to the fact that in commercial maize production, biotechnology offers important economic and environmental benefits that should be evaluated under the current regulatory framework to ensure food safety, which was cited frequently at the symposium. It is unfortunate that the chapters of the draft document that were allotted for analyzing the framework of benefits and risks make such a detailed analysis of the risks and so poor an analysis of the benefits, which have been found in opinions similar to ours. In this sense, it is necessary to approach biotechnology as a dynamic set of techniques offering solutions to problems such as drought, the adaptation of high-yield materials to local conditions, contributions to solving pest and weed problems, the improved contribution of nutrients by landrace maize, etc.

Furthermore, we stress that the benefits of products of agricultural biotechnology are for small-scale farmers and commercial growers alike, especially because the technology is incorporated into the seed. Consider that the products currently available on the market, in addition to the direct benefits of greater production, should consider the benefits resulting from the decreased application of pesticides and a smaller environmental impact for farming.

We are certain that the exercise of this assessment would be more useful and enriching if it were undertaken with greater scientific objectivity. This would prevent ideological biases from leading to wrong decisions that could marginalize entire regions of the country from the benefits of technological progress. We wonder whether the decision makers and their advisors are entitled to disqualify these technologies *a priori* without performing a scientific analysis that is solidly supported by data from Mexican field evaluations. This would prevent small and large growers from using advanced technologies without consultation, dooming them to missing out on innovation.