



## **NATIONAL FORUM OF STRUGGLE AGAINST THE IMPACTS OF PESTICIDES AND TRANSGENICS**

### **PUBLIC NOTE**

#### **Approval of Transgenic Wheat (IND-00412-7) and its derivatives**

**THE NATIONAL FORUM OF STRUGGLE AGAINST THE IMPACTS OF PESTICIDES AND TRANSGENICS**, the **STATE AND REGIONAL FORUMS** named below, assemblies of citizen's control over administration which bring together entities of civil society acting on state, regional and national levels, government bodies, the Public Prosecutor's Office, the Public Defender's Office, representatives of academic and scientific sectors and organised civil society come publicly to speak out about the transgenic wheat (IND-00412-7) and derivatives approval, seeing that:

1. The mission of the NATIONAL, STATE AND REGIONAL FORUMS is to develop proposals and monitor public policies and other issues related to the negative impact of pesticides, similar products and transgenics on the environment, and the worker's health, consumers and society as a whole.

2. The Forums are formed by organized civil society entities, as well as public and private institutions, which gives them representativeness to defend those diffuse rights and interests.

3. An ecologically balanced environment constitutes a **diffuse fundamental right**, recognised by the Constitution of the Federative Republic of Brazil, and both the Government and the community shall have the duty to defend and preserve it for present and future, of according to its article 225<sup>1</sup>, even before economic activities, as enforced by article 170, VI<sup>2</sup>.

4. Adequate health and food are social rights recognised by article 6 of the Federal Constitution. Health actions and services are expressly classified as public utility services (article 197).

5. Consumer protection is a fundamental right and an economic order principle according to article 5, XXXII and 170, V of the Federal Constitution.

6. The Forums recognise the need to reconcile the human economy with the environment in the long term, which is a function of ecological economics, and that compatibility must be ensured in markets by valuing environmental resources and services oriented by the guidelines of enforcing the constitutional principle of sustainable development,

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1 Art. 225. Everyone has the right to an ecologically equilibrated environment, a good of common usage by the public and essential to a healthy quality of life. That imposes on the Public Power and the whole of society the duty to defend it and preserve it for the present and future generations.

2 Art. 170. The economic order, founded on the value of human labour and free initiative, has the goal of ensuring a dignified existence to all, according to the tenets of social justice, observing the following principles:

(...)

VI – defence of the environment, including through a different treatment according to the environmental impact of products and services and their processes of elaboration and the way they are offered; (Text provided by Constitutional amend nº 42 from 19.12.2003).

(...)

as expressed by the National Forum during the UN 2023 Water Conference, which took place at the headquarters of the United Nations.

7. The National Technical Commission on Biosafety (CTNBio approved transgenic wheat (IND-00412-7) and derivatives (File n.º 01250.014650/2019-71) at its 259th ordinary meeting, held on March 1st, 2023.

8. Several civil associations, like Brazilian Agroecology Association, Land of Rights, FIAN Brazil sent a petition to the President of the National Biosafety Council (CNBS), to the Minister Chief of Staff of the Presidency, to the Public Prosecutor's Office, to the National Forum and other bodies, requesting the cancelation of transgenic wheat sowing approval, pointing out that the administrative procedure was marred by gross errors, illegalities and contradictory information, thus exposing the Brazilian people to numerous risks.

9. The signatories of the petition request that CNBS, as the last political instance in terms of biosafety, take over the administrative process nº 01250.014650/2019-71 and suspend the approval granted by CTNBio, since there was no necessary and rigorous analysis of the environmental impact on health, as well as on the sovereignty of the country regarding its food system.

10. The aforementioned notice was classified as Administrative Procedure NF - 1.16.000.001017/2023-63 and distributed to the Public Attorney's Office of the Federal District on March 21st, 2023.

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3. According to item 2.3 of the minutes of the said meeting, available on: <<http://ctnbio.mctic.gov.br/documents/5665229/2310001/Delibera%C3%A7%C3%B5es259+PLEN%C3%87O++2023/6ac8325e-d8de-475d-bb8c-19a13260d756?version=1.0>>. Accessed on 27/3/2023.

4. Full Note available on: <<https://fianbrasil.org.br/wp-content/uploads/2023/03/Oficio-CNBS-Trigo-Transgenico.pdf>>. Accessed on 27/3/2023.

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11. In turn, bill n.º 2755/2021, is pending in the chamber of deputies. It proposes the prohibition of sowing and commercialising transgenic wheat in Brazil, considering that, under the terms of the project's justification, "wheat has gained resistance to the use of a pesticide known to be more toxic than those most commonly used today", which is glufosinate-ammonium; that "wheat with that characteristic has been prohibited in Europe", and that "we are dealing with something whose consequences are unknown".

12. The sow of herbicide-tolerant transgenic crops increases the use of those products, and potentially, the risks to human health and the environment by increasing the volumes applied in the planted areas.

13. The dangers of approving transgenic wheat are unknown. The amount of DNA inserted in that GMO is of approximately 62,000 base pairs, in addition to genes of interest, whose gene expression can produce molecules which haven't been studied adequately, therefore its effects on human health are unknown. Despite that, they can be found in the wheat flour. In general, there are more base pairs of DNA inserted than necessary for the gen of interest to be functional, but in terms of number of unintentional base pairs, this transgenic is the largest of all.

14. There is no proof of that alleged resistance to drought, but on the other hand, it is a fact that the liberated wheat is tolerant to the herbicide glufosinate-ammonium, which is a pesticide that affects the nervous system, and can cause reproductive and cognitive problems, with genotoxic potential, which is an effect that harms the genetic material of cells.

15. Scientific literature shows that glufosinate-ammonium can cause reproductive problems and on the cognitive development in children of mothers exposed during

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5 Available on: <[https://www.camara.leg.br/proposicoesWeb/prop\\_mostraintegra?codteor=2054091](https://www.camara.leg.br/proposicoesWeb/prop_mostraintegra?codteor=2054091)>. Accessed on 27/3/2023.

6 Almeida VES, Friedrich K, Tygel AF, Melgarejo L, Carneiro FF. Use of genetically modified crops and pesticides in Brazil: growing hazards. *Cien Saúde Colet* 2017; 22(10):3333-3339.

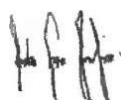
pregnancy, neurological damage, including in embryos and with negative impacts on biodiversity<sup>7 8 9</sup>.

For those reasons, the **FORUMS SUPPORT** the petition of the civil entities, corroborating all the relevant and well-explained foundations present in its content which, in addition to the terms of the justification of Bill n.º 2755/2021, being processed in the Chamber of Deputies, and the arguments of the scientific community, impose the immediate suspension of the commercial liberation of transgenic wheat.

## **IN CONCLUSION:**

THE NATIONAL FORUM, the STATE FORUMS, and the REGIONAL FORUMS understand that the precautionary principle must prevail. It was adopted during the United Nations Conference on Environment and Development (CNUMAD from 1992)<sup>5</sup> and elevated to the status of a norm of international law by the “Rio declaration”<sup>6</sup>, as well as contrary data and manifestations by civil society and specialists, which indicate serious damage to the environment and to the lives of Brazilian people. Therefore, CTNBio, CNBS and the Federal Government must reconsider the Transgenic Wheat (IND-00412-7) and its derivatives approval.

Brasilia, 27 March, 2023.



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Coordinator of the National Forum

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7 Castro et al., The Influence of Agrochemicals Present in Maternal Nutrition in the Birth of Children with Autistic Spectrum Disorder Archives of Neurology and Neuro Disorders, v.3, n. 1, 2020, p.12-20. The influence of agrochemicals present in maternal nutrition in the birth of children with autistic spectrum disorder (1librarv.org).

8 Watanabe, T., & Sano, T. (1998). Neurological effects of glufosinate poisoning with a brief review. Human & Experimental Toxicology, 17(1), 35-39. doi:10.1177/096032719801700106

9 Ferramosca et al, 2021. Herbicides glyphosate and glufosinate ammonium negatively affect human sperm mitochondria respiration efficiency. Reproductive Toxicology, v.99, p. 48-55

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Adjunct Coordinator of the National Forum

**LUIZ CLÁUDIO MEIRELLES**

Executive Secretary

**List of the State Forums**

1. Coordinators of the National Forum of Struggle against the Impacts of Pesticides;
2. Rapporteur of the Commission of Tutelage and Observation;
3. Rapporteur of the Regulation Commission;
4. Rapporteur of the Communication and Articulation;
5. Coordinators of the State and Regional Forums:
  - 5.1. Forum of Struggle against the Impacts of Pesticides and Transgenics in Pernambuco;
  - 5.2. Forum of Struggle against the Impacts of Pesticides in Paraná;
  - 5.3. Potiguar Forum of Struggle against the Impacts of Pesticides and Transgenics in Defense of Agroecology;
  - 5.4. State Forum of Struggle against the Impacts of Pesticides in Rio de Janeiro;
  - 5.5. Bahia Forum of Struggle against the Impacts of Pesticides, Transgenics, and for Agroecology - FBCA;
  - 5.6. Gaúcho Forum of Struggle against the Impacts of Pesticides;
  - 5.7. Goiás Forum of Struggle against the Impacts of Pesticides;
  - 5.8. Mato Grosso Forum of Struggle against the Impacts of Pesticides

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- 5.9. Forum of Health, Safety and Work Hygiene in Mato Grosso do Sul (FSSHTe-MS), Commission of Struggle against the Impacts of Pesticides;
- 5.10. Paraense Forum of Struggle against Pesticides;
- 5.11. State Forum of Struggle against the Impacts of Pesticides in Acre;
- 5.12. Catarinense Forum of Struggle against the Impacts of Pesticides and Transgenics;
- 5.13. Cearense Forum of Struggle against the Impacts of the Use of Pesticides;
- 5.14. Sergipano Forum of Struggle against Agricultural Poisons and Transgenics;
- 5.15. Paraibano Forum of Struggle against the Indiscriminate Use of Pesticides;
- 5.16. Permanent Forum of Struggle against the Use of Pesticides in São Francisco Valley;
- 5.17. Tocantinense Forum of Struggle against the Impacts of Pesticides;
- 5.18. Forum of Struggle against the Impacts of Pesticides in Amazonas;
- 5.19. Alagoano Forum of Struggle against the Impacts of Pesticides;
- 5.20. Paulista Forum of Struggle against the Impacts of Pesticides and Transgenics;
- 5.21. Forum of Struggle against the Impacts of Pesticides and Transgenics in the Federal District;
- 5.22. State Forum of Struggle against the Impacts of Pesticides in the South of Maranhão;
- 5.23. State Forum of Struggle against the Impacts of Pesticides in Espírito Santo;
- 5.24. State Forum of Struggle against the Impacts of Pesticides in Piauí;
- 5.25. State Forum of Struggle against the Impacts of Pesticides in Roraima;
- 5.26. State Forum of Struggle against the Impacts of Pesticides in Minas Gerais;

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- 5.27. State Forum of Struggle against the Impacts of Pesticides in Rondônia;
- 5.28. State Forum of Struggle against the Impacts of Pesticides in the North of Paraná;
- 5.29. State Forum of Struggle against the Impacts of Pesticides and Transgenics in the South of Pará;
- 5.30. Amazonense State Forum of Struggle against the Impacts of Pesticides;
- 5.31. Tocantinense State Forum of Struggle against the Impacts of Pesticides;