



चौ० राकेश टिकैत
(राष्ट्रीय प्रवक्ता)



किसान भवन, मिरौली

भारतीय किसान यूनियन

1248/97, साउथ सिविल लाईन्स,
मुजफ्फरनगर-251001, (उ.प्र.)

टेलीफोन: +91-131-2621168, 09219666799

E-mail : bku.tikait@gmail.com

www.bhartiyakisanunion.org

दिनांक :

To:
The Chief Executive Officer,
Food Safety and Standards Authority of India (FSSAI),
FDA Bhawan, Kotla Road,
New Delhi – 110 002

Jan 26th, 2022

Sub: Bhartiya Kisan Union objections to, and rejection of FSSAI's proposed draft GMO regulations called "[Food Safety and Standards \(Genetically Modified or Engineered Foods\) Regulations, 2021](#)"

Dear Shri Arun Singhal ji,

On behalf of the Bhartiya Kisan Union, we write to you to express our serious objections to the draft regulations on GMOs put out by the FSSAI. After farmer unions and other citizen groups as well as state governments ensured that no GM food crops are allowed to be cultivated in India, and that risky field trials are stopped, we find that the regulations being proposed by FSSAI are just one more attempt to bring in unsafe and unwanted GMOs and GM foods into India.

We list our key points of feedback below, and find that the format that FSSAI prescribes for feedback is a way of keeping out fundamental objections to regulations like these:-

- 1. The weak regulations allow for backdoor entry of GMOs:** The draft regulations proposed by the FSSAI are certainly inadequate to ensure food safety. Basing decisions in India on approvals given elsewhere is a complete mockery of the regulator's responsibility to evolve regulation as per our own needs and requirements. The draft regulations have no mention of any independent and long term impact studies, that too in a comprehensive fashion. No market surveillance mechanisms have been proposed, nor is it clear who will be taking decisions and with whose interests kept in mind. Labeling mechanisms don't uphold a consumer's right to know and right to informed choices. Importantly, state governments are not given a veto role, among many other shortcomings. Such regulations will easily allow GM foods to come into India and this seems to be the sole purpose for which regulations have been proposed in this manner. Meanwhile, what we actually require are strong regulations and their implementation, embedded in the precautionary principle, which is at the core of the Cartagena Protocol on Biosafety that India is a signatory to. The precautionary principle should urge us to indefinitely ban the production, import, and sale of GMOs in India given the grave dangers of such a technology.

2. FSSAI's track record on food safety is concerning: Over the past years we have seen how FSSAI has not fulfilled its responsibility of being a regulator of food safety and instead has acted as a promoter of GM foods and food industry's profits in general. This, despite the clear and scientific evidence of GMOs harms to health, environment, and farm livelihoods. For instance, FSSAI had set up a scientific panel in which members have a serious conflict of interest, with GM propagandists and promoters brought in. We have also learned that the recent draft regulations on GMOs introduced by the FSSAI were first taken to the industry for feedback and only later opened for comment by citizens. We find that this is a serious breach of its mandate and we cannot trust that the FSSAI will protect our health and food safety.

3. India does not need GMOs and has rejected them: We are aware of the scientific evidence on the health, environment, and economic risks posed by GM technology. This is why, GMOs have been rejected by India's citizens, led by farmer unions such as ours, as we saw in the case of both Bt Brinjal and HT Mustard. Most of our state governments have also rejected GM technology.

For farmers, the threat of corporate capture of our food systems is too great. We see GM foods as a ploy by the biotech industry, especially when we have successfully managed to stall the commercial cultivation permission for GM crops in India. We have countless alternatives to GMOs in the form of indigenous crop varieties and farming practices that together are able to outperform GMOs without any of the associated risks. In the case of processed food too we have innumerable alternatives present in India and so there is no requirement for us to import such products.

We conclude by stating once again that we reject GM technology in our food and farming systems, and we also reject these so-called draft regulations by FSSAI. What we want is a prohibition of GM foods, and for FSSAI to enforce the same, and regulations created for that purpose.

Signed by:



**Rakesh Tikait
National Spokesperson
Bhartiya Kisan Union**