Dear Mr Andriukaitis,

Request for internal review under Article 10 of Regulation (EC) No. 1367/2006 against the decision of the EU Commission to give market authorisation to herbicide-tolerant genetically modified oilseed rape MON 88302 for food and feed uses, import and processing under Regulation (EC) No 1829/2003 from Monsanto.

Gene Watch UK urges the European Commission to withdraw market authorisation for the genetically engineered oilseed rape MON88302. This is a formal request for internal review of the authorisation under Article 10 of Regulation (EC) No. 1367/2006.

The grounds of complaint are that:
• EFSA’s assessment of the molecular data and gene expression is not sufficient
• EFSA’s comparative risk assessment is fundamentally flawed
• EFSA’s assessment of toxicology is inadequate
• EFSA’s environmental risk assessment is fundamentally flawed
• The Commission should have requested much more targeted monitoring and risk management measures

EU regulations in this context that are violated or disregarded by the market authorisation are inter alia: Directive 2001/18 and Regulation 1829/2003. These regulations require a high standard for the protection of human health and the environment with the precautionary principle being the underlying paradigm. It is evident from the technical document as prepared by Testbiotech (attached) that these standards are not met by the risk assessment as performed on MON88302.

9 of June 2015
Please see attached the following documents:

- Technical background for a complaint under Article 10 of Regulation (EC) No. 1367/2006 against decision of EU Commission to give market authorisation to genetically engineered oilseed rape MON88302
- statutes of the organisation
- annual report

GeneWatch UK is a not-for-profit company registered in England and Wales with Company Number 3556885. Genewatch UK’s public ID number in the EU’s Transparency Register is: 00705635730-34.

Please let us know if you need any further information regarding legal or scientific issues. Please also let us know if the process will be started, how long it will take and if there is a possibility or need for further input.

With kind regards,

GeneWatch UK

Email: @genewatch.org