

Aan de staatssecretaris van
Infrastructuur en Milieu
Mevrouw S.A.M. Dijkma
Postbus 20901
2500 EX Den Haag

DATUM 20 april 2017
KENMERK CGM/170420-01
ONDERWERP Additional advice on import and processing of soybean DAS-44406-6

Dear Minister,

In 2013, COGEM published its advice on import and processing of genetically modified soybean DAS-44406-6 (EFSA/GMO/NL/2012/106).¹ DAS-44406-6 is tolerant to glyphosate, 2,4-D and glufosinate-ammonium containing herbicides due to the expression of the *2m epsps*, *aad-12* and *pat* genes. COGEM concluded that import and processing of DAS-44406-6 poses a negligible risk to the Dutch environment.

COGEM also examined the submitted General Surveillance plan and noted that some of the hyperlinks in the provided plan were not functional. COGEM pointed out that these hyperlinks have to be updated to allow operators to easily retrieve information on DAS-44406-6, and to provide them easy access to contact details in case unexpected adverse effects would be observed. COGEM also identified some other aspects of the General Surveillance plan that could be improved. For instance, by a commitment that Member States will have access to raw monitoring data and the analyses thereof, and by a statement that Member States will be informed directly in case of unexpected adverse effects.

Overall, the submitted General Surveillance plan was, however, considered adequate for import and processing of DAS-44406-6 soybean.

Recently, European Food Safety Authority (EFSA) published its overall and scientific opinions on import and processing of DAS-44406-6 soybean.^{2,3} The Netherlands Ministry of

¹ COGEM (2013). Import of genetically modified soybean DAS-4406-6 with three herbicide tolerance traits. COGEM advice CGM/130627-01

² EFSA (2017). Overall opinion of the European Food Safety Authority on application (EFSA-GMO-NL-2012-106) by Dow AgroSciences LLC for placing on the market of genetically modified herbicide-



Infrastructure and the Environment asked COGEM whether EFSA sufficiently answered COGEM's comments on the application for import and processing of DAS-44406-6.

COGEM notes that, although EFSA thanks the Netherlands for its remark,⁴ the non-functional hyperlinks were not replaced in the General Surveillance plan attached to the EFSA opinion.⁵ COGEM trusts that the hyperlinks will be updated in the near future.

COGEM remains of the opinion that DAS-44406-6 soybean poses a negligible risk to the environment and considers the provided General Surveillance plan adequate for import and processing of DAS-44406-6 soybean.

Sincerely yours,

Prof. dr. ing. Sybe Schaap
Chairman of COGEM

c.c. Drs. H.P. de Wijs, Hoofd Bureau ggo
 Mr. J.K.B.H. Kwisthout, Ministerie van IenM
 Ing. M.A.C. Möllers, Food-Feed loket

tolerant soybean DAS-44406-6 for food and feed uses, import and processing in accordance with Articles 6 and 18 of Regulation (EC) No 1829/2003. EFSA supporting publication 2017: EN-1197

³ EFSA (2017). Scientific opinion on an application by Dow AgroSciences LLC (EFSA-GMO-NL-2012-106) for the placing on the market of genetically modified herbicide-tolerant soybean DAS-44406-6 for food and feed uses, import and processing under Regulation (EC) No 1829/2003. EFSA Journal 15(3): 4738

⁴ EFSA (2017). Annex G – Application EFSA-GMO-NL-2012-106 (soybean DAS-44406-6) – Comments and opinions submitted by Member States during the three-months consultation period

⁵ EFSA (2017). Annex F – Monitoring plan for DAS-44406-6 soybean conforming with Annex VII to Directive 2001/18/EC