

Aan de staatssecretaris van
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DATUM 02 oktober 2026
KENMERK CGM/261002-02
ONDERWERP Advies Hernieuwing importvergunning van gg-maïs DAS-40278-9

Geachte mevrouw Bertram,

Naar aanleiding van een adviesvraag (MA 260008_001) over de milieurisico's van hernieuwing van de vergunning voor import en verwerking van gg-maïs DAS-40278-9, ingediend door Corteva Agriscience LLC, deelt de COGEM u het volgende mee. Op verzoek van het Food-Feed loket voor ggo-markttoelatingen is het advies in het Engels opgesteld.

Samenvatting:

De COGEM is verzocht om te adviseren over de hernieuwing van de vergunning voor import en verwerking van de genetisch gemodificeerde maislijn DAS-40278-9. Eerder heeft de COGEM positief geadviseerd over import en verwerking van deze lijn. In deze lijn wordt een gen tot expressie gebracht waardoor de gg-maïs tolerant is voor verschillende herbiciden;

Er zijn geen verwildeerde maïspopulaties in Nederland. De wilde verwant van maïs, teosinte, komt in Nederland niet voor in de natuur of op agrarische percelen.

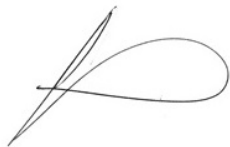
De geactualiseerde bio-informatica-analyses, een recente literatuurstudie en de resultaten van de verplichte 'post-market environmental monitoring' geven geen aanwijzingen dat de gg-maïs DAS-40278-9 een milieurisico zou kunnen vormen.

Op basis van bovenstaande overwegingen is de COGEM van oordeel dat de milieurisico's van hernieuwing van de vergunning voor import en verwerking van gg-maïs DAS-40278-9, verwaarloosbaar klein zijn.

Omdat een voedselveiligheidsbeoordeling door andere instanties wordt uitgevoerd, heeft de COGEM de risico's van incidentele consumptie niet beoordeeld.

De door de COGEM gehanteerde overwegingen en het hieruit voortvloeiende advies treft u hierbij aan als bijlage.

Hoogachtend,



Prof. dr. ing. Sybe Schaap
Voorzitter COGEM

C.C.

- Bureau ggo, Afdeling Gentechnologie en Biologische Veiligheid, RIVM
- Directie Omgevingsveiligheid en milieurisico's, DG Milieu en Internationaal, Ministerie van IenW
- Food-Feed loket, RIVM

Renewal of import and processing of GM maize DAS-40278-9

COGEM advice CGM/261002-02

COGEM has been requested (MA 260008_001) to evaluate the environmental risks associated with the renewal of the authorisation for import, processing and food and feed use of genetically modified (GM) maize DAS-40278-9 (GMFF-2025-37093, RX051), as submitted by Corteva Agriscience Belgium B.V. on behalf of Corteva Agriscience LLC.

GM maize DAS-40278-9 expresses a plant-optimised version of the gene *aad-1* (aryloxyalkanoate dioxygenase), originating from the bacterium *Sphingobium herbicidovorans*.¹ The enzyme this gene encodes confers tolerance to several synthetic auxin-acting-herbicides such as 2,4 dichlorophenoxyacetic acid (2,4-D) and to herbicides containing aryloxyphenoxypropionate (AOPP).

COGEM has previously advised positively on the import and processing of DAS-40278-9,² as well as on the import and processing of several stacked events with DAS-40278-9 as one of the parental lines.^{3,4,5,6,7,8,9} The GM maize has been authorised for placement on the market in the European Union in 2017.¹⁰

Maize (*Zea mays*) is a highly domesticated crop that is cultivated globally. Maize is wind pollinated.^{11,12} Insect pollination of maize is highly limited but cannot be excluded.¹³ Maize is very sensitive to weed competition.¹⁴ During the long process of domestication, maize has lost the ability to persist in the wild.¹² After ripening, the seeds (the kernels) adhere to the cob and do not scatter naturally.^{13,15} Consequently, seed dispersal is severely hampered.

Maize does not tolerate prolonged cold and frost, and requires warm conditions to grow.^{13,16,17} In cultivation areas with warm climatic conditions, volunteers can be present the year following maize cultivation due to spilled cobs or kernels. However, these volunteers are usually killed by common mechanical pre-planting soil preparation practices.¹³ In the Netherlands the appearance of volunteers is rare, although maize plants occasionally have been observed outside agricultural fields.^{16,18} Any volunteers emerging will be killed by frost at the onset of winter.¹⁶ COGEM is not aware of any reports of feral maize populations in the Netherlands.¹⁶ Hybridisation of GM maize with species other than teosinte – the wild relative of maize – cannot occur. Teosinte seeds can be purchased in the Netherlands,¹⁹ however – as it is absent in maize fields and nature in the Netherlands¹⁶ – the risks of hybridisation of GM maize with teosinte is negligible in the Netherlands.

In the application for renewal, the bioinformatic analysis of the inserted elements and their 3' and 5' junctions in the genome of GM maize DAS-40278-9 was updated to assess protein sequence similarities using up-to-date databases of allergens, toxins, and general proteins. No indications for potential environmental risks were identified.

The applicant performed a systematic literature search using a collection of bibliographic databases, covering the period from January 2017 to January 2026. No publications were identified that would

invalidate the conclusions of the previous risk assessment. There is no indication that the introduced traits in GM maize DAS-40278-9 will allow the GM maize to survive or establish in the Dutch environment.

The applicant supplied annual reports on the monitoring carried out between 2018 and 2025. The information in the annual monitoring reports gives no indication of adverse effects or incidents resulting from import and processing of maize DAS-40278-9. The applicant did not propose any changes to the existing post-market environmental monitoring (PMEM) plan for maize DAS-40278-9. COGEM has published several recommendations for further improvement of the PMEP plan,^{20,21} but considers the current PMEM plan adequate for import and processing of GM maize DAS-40278-9.

COGEM is of the opinion that renewal of the market authorisation for import and processing of GM maize DAS-40278-9 poses a negligible risk to the Dutch environment. COGEM abstains from giving advice on the potential risks of incidental consumption, as a food/feed assessment is carried out by other organisations.

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