

Public Comments for
Part C
Notification
C/NL/04/02

Dianthus caryophyllus L. (carnation)
with modified flower colour

-----Original Message-----

From: xxxxxxxxxxxx
Sent: 30 September 2004 00:19
To: gmoinfo-comments@jrc.it
Subject: Comment on SNIF C/NL/04/02

Are you all crazy? As if nature is not beautiful enough.

xxxx
xxxxx
xxxxx

-----Original Message-----

From: xxxxxxxx
Sent: 29 September 2004 21:35
To: gmoinfo-comments@jrc.it
Subject: Comment on SNIF C/NL/04/02

LS

As long as the ecological consequences of introducing GMO's in the landscape have not been carefully assessed for the long term, I strongly object to this ornafranken business.

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-----Original Message-----

From: xxxxxxxxxxxx
Sent: 06 October 2004 19:54
To: gmoinfo-comments@jrc.it
Subject: Comment on SNIF C/NL/04/02

Geachte heer/mevrouw,

Ik wil bij deze bezwaar maken tegen het veranderen van de bloemkleur via genetische manipulatie. Ik ben van mening dat ook genetische manipulatie bij planten zou moeten uitgaan van het "neetenzij"principe. Verandering van bloemkleur is zeker een onvoldoende (want onnodig) reden om tot genetische manipulatie over te gaan. Daarbij komt dat verandering van kleur ook via de normale veredelingsmethoden tot stand kan worden gebracht. Dus onnodig en er is een alternatief. Derhalve niet toestaan.

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-----Original Message-----

From: xxxxxx

Sent: 23 October 2004 14:50

To: gmoinfo-comments@jrc.it

Subject: Comment on SNIF C/NL/04/02

Good afternoon Sir or Madam,

Thank you for improving Gods'creation. (...)

But, I have moral objections to any man-made genetic modification of plants or animals, in this case of yet another flower with a different colour.

I believe we have more than enough choice the way it is now, and in addition, I believe we have other issues world wide to spend our time and efforts on than genetically modifying a flower.

kind regards, xxxxxx

-----Original Message-----

From: xxxxxx

Sent: 29 October 2004 14:12

To: gmoinfo-comments@jrc.it

Subject: Comment on SNIF C/NL/04/02

I see the following insufficiencies in this notification:

Under E.11. Dissemination the notifier says:

Genetic material from cultivated carnation could theoretically be disseminated through seed or insect pollination or vegetative propagation. He claims then that "none of these avenues are realistic avenues for gene dispersal in the case of the carnation flowers imported into Europe."

I would maintain that there are potential realistic avenues. Carnations are frequently used in wreaths and bouquets on cemeteries and for other outside decoration, not just inside dwellings. Furthermore, hobby gardeners could propagate these carnations in a common way, as described by the notifier in E.9(a) (i) and be successful.

In E.10 (b) the notifier says " Imported carnation flowers will not survive more than 3 weeks in the hands of consumers. During this time seed set is impossible." But only "discarded carnation flowers have no vegetative propagation capability." Propagation could be undertaken within these 3 weeks.

Therefore the notifiers entry in E.31 (a) Effects on biodiversity in the area of cultivation: "Not applicable. The products are cut flowers and will not be cultivated" is wrong or at least ignorant of the fact of possible cultivation.

For the fact that such propagation is possible, one has to look at the notifiers entry under E.9(b) Sexual compatibility with other cultivated or wild plants more closely:

"However, the exact taxonomic and breeding history of carnation is not known and it is almost certain that carnation is a hybrid involving two or more Dianthus species, one of which is likely to be Dianthus caryophyllus." This part makes the certainty of the following questionable: "Whilst there are wild Dianthus species in Europe, there is no compatibility between these plants and imported carnation flowers, there is no potential for hybridisation.

I further wish to ask whether these carnations will be labeled in shops so the end consumer will no their GMcontent? I do not understand regulations to this regard.

Sincerely

xxxxxx

xxxxxx

xxxxxx

xxxxxx

-----Original Message-----

From: xxxxxxx

[mailto:xxxxxxx

Sent: 29 October 2004 16:46

To: gmoinfo-comments@jrc.it

Subject: Comment on SNIF C/NL/04/02

In allegato i commenti dell'Osservatorio Agrobiotecnologie.

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COMMENTS TO THE SNIF C/NL/04/02

General aspects:

- There is no possibility to verify the given information, for lack of appropriate bibliographical references.

Technical comments:

Molecular characterisation

The size and structure of the inserts have been analysed only by Southern blot: it seems to be inadequate, particularly if we consider that the T-DNA is very complicated and consisting of 12.292 base pair, and the high copy number of the insert. We retain, according with the EFSA GMO panel¹, that it is necessary to supply:

- the position of all coding and non-coding sequences really inserted in the plant genome,
- sequence data of the inserted material and of the flanking 5' and 3' regions. Information on flanking sequences should be sufficient to allow identification of potential chimeric ORFs generated at the junctions of the insert and the plant DNA
- Expression level of all three gene present in T-DNA should be analysed

¹ DRAFT GUIDANCE DOCUMENT FOR THE RISK ASSESSMENT OF GENETICALLY MODIFIED PLANTS AND DERIVED FOOD AND FEED April 2004 Prepared by the Scientific Panel on Genetically Modified Organisms of the European Food Safety Authority p. 15-17.

Assessment of use in animal feeds

- Occupational respiratory symptoms caused by decorative flowers are seldom reported in the literature. However, in Spain a large portion of the population who works in carnation (*Dianthus caryophyllus*) have symptoms of rhinitis and asthma related to exposition. There are also cases of flowers suppliers who developed IgE-mediated allergic rhinoconjunctivitis with nasal polyps, and contact urticaria and dermatitis after handling *Dianthus caryophyllus*.

Assessment of environmental risk

- Considering content of the points E.11 and E.10 (b) of the SNIF, We think that exists the possibility that the imported cut flowers can vegetatively be propagated. Notifier's environmental risk assessment has not considered the consequential risks of the not authorized vegetative propagation of the carnations GM. Such possibility it is not to exclude as it shows the case of the pollution of local varieties of mexican corn from corn GM introduced from the United States without authorization.