

11-57

(SANCO)

ARes (2013) 549243

From: (SANCO) on behalf of ANDRE Dorothee (SANCO)
Sent: 02 April 2013 11:50
To: (SANCO)
Subject: FW: ARMGs - Following meeting 8 March 2013

Dear
please for registration.
Thank you,

Assistant



European Commission
Health and Consumers Directorate-General
Safety of the Food Chain
Biotechnology
B-1049 Brussels/Belgium

B232

From:
Sent: Thursday, March 28, 2013 8:53 AM
To: ANDRE Dorothee (SANCO)
Cc: (SANCO); (SANCO); (SANCO);
(SANCO); (SANCO)
Subject: RE: ARMGs - Following meeting 8 March 2013

Dear Dorothee, dear all,

As a CropLife International member company, Dow AgroSciences keeps to industry's commitment made to Commissioner Dalli in 2010 to work on alternative technologies that will facilitate the phase out of Antibiotic Resistance Markers (ARMs) within new biotech events not yet in development.

We have implemented this commitment and we can confirm that Dow AgroSciences has taken active steps to phase out the use of ARMs for new biotech events that are currently under development.

However, as indicated already in our correspondence in 2010, Dow AgroSciences "may stack its ARM free products with products from other companies that may contain ARMGs."

This is the case for new stacked cotton products which will be submitted by Dow AgroSciences to the EU for import in the coming 3-5 years.

We estimate at this stage that at least 3 cotton stacks with products containing ARMGs will be submitted by Dow AgroSciences. Consistent with product life cycles and depending on further developments, it cannot be excluded that more stacks will follow later on.

The licensing agreement concerns an ARM-containing cotton product for which a dossier is yet to be submitted in the EU. We suggest that you contact Syngenta for any further information on this product.

We remain at your disposal should you have further questions

Happy Easter,

From:

Dorothee.Andre@ec.europa.eu

Sent: Friday, March 22, 2013 2:54 PM

To:

Cc:

On Behalf Of

Subject: ARMGs - Following meeting 8 March 2013

Dear

I am following up on our meeting on antibiotic resistance genes (ARMGs) on 8 March 2013, when we discussed a strategy to phase them out.

In this meeting reference was made to a letter of CropLife International from 23 April 2010 to Commissioner Dalli, where CropLife indicated that member companies have been working proactively on alternative technologies that will facilitate the phase out of ARMs within new biotech events not yet in development. For commercial products and those in development, phase out will be consistent with product life cycles.

However, during the meeting some participants pointed out that products in development could still harbour these genes and could be placed on the market.

I would like to note in this context that Dow AgroSciences wrote to the Commission on 11 March 2010 stating that "Dow AgroSciences (DAS) has no plans to market products containing ARMGs in them." On 12 March 2010 you further specified that DAS "may stack our ARM free products with products from other companies that may contain ARMGs."

Against this background, I would appreciate if you could confirm whether DAS will or will not submit stacks with ARMG in the EU and provide us with the list of those stacks, if applicable.

I would appreciate an answer by end of March 2013.

Dorothee André

Sent by



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