

Comments to EFSA document:

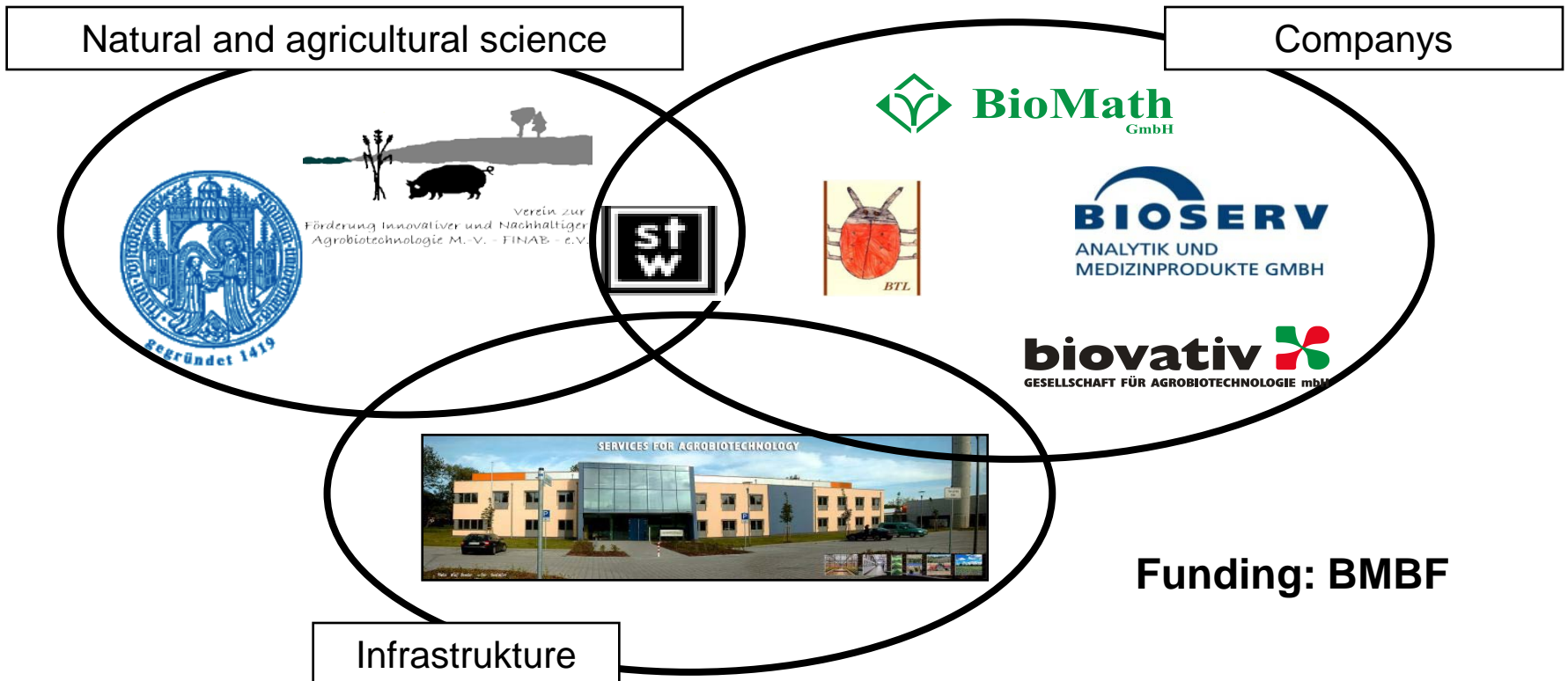
3.4 Comparators for other approaches to gene, trait and event stacking

Inge Broer, Universität Rostock, FINAB e.V

The innovative growth core BioOK

Aim: Development of effective and safe assessment methods for GMP

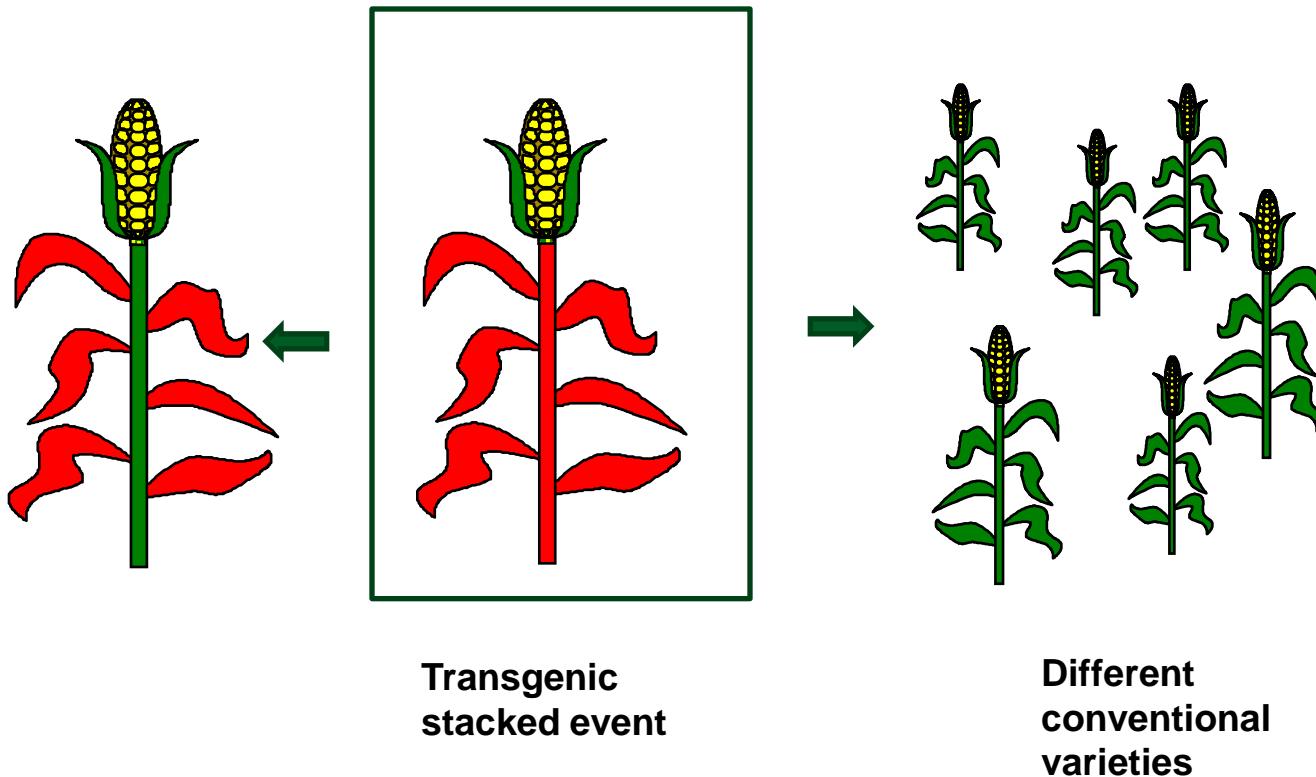
Partners:



General comment

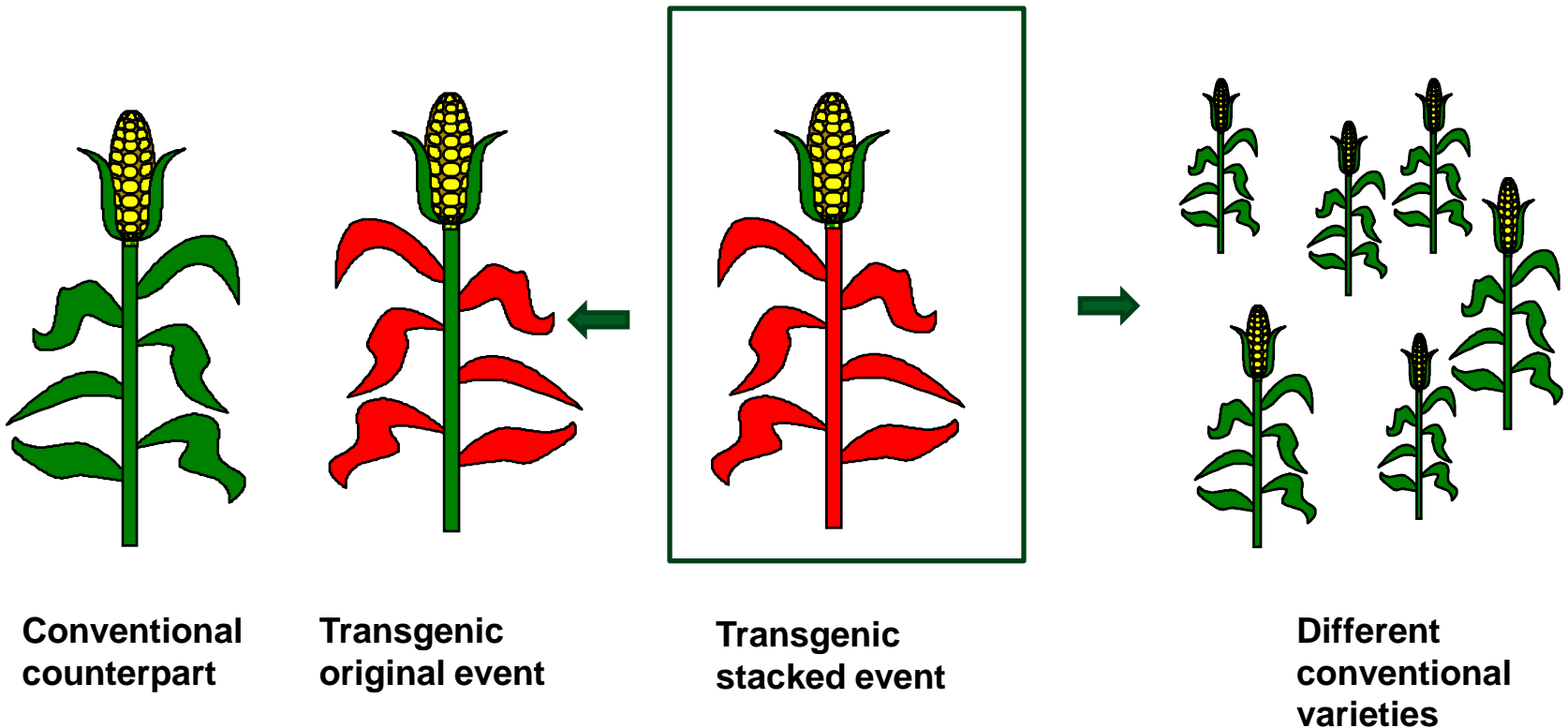
A GM plant should always be compared to:

- A plant that differs only in one trait
- Several different conventional varieties of the same cultivar



General comment

If the original transgenic event is approved, it is the closest possible comparator



Approved or completely risk assessed events are considered as safe.

Why does the GMO panel hesitate to use them as comparators?

The conventional counterpart used for the transformation of the original event should be one of the six conventional varieties that are part of the risk assessment to describe the natural variation of the parameters assessed

Comparison high amylopectin conventional
variety to a high amylopectin transgenic event:



Comparison of production process instead of the
of the new trait.