

To all Ministries represented at the CTNBio (Brazilian Biosafety Commission):

- Ministry of Science, Technology and Innovation – Sr. José Aldo Rebelo Figueiredo
Email: ministro@mcti.gov.br

- Ministry of Agriculture – Sra. Kátia Abreu
Email: gm@agricultura.gov.br

- Ministry of Health – Sr. Arthur Chioro
Email : chefia.gm@saude.gov.br

- Ministry of Environment – Sra. Izabella Mônica Vieira Teixeira
Email: gm@mma.gov.br

- Ministry of Agrarian Development – Patrus Ananias de Sousa
Email: agendaministro@mda.gov.br

- Ministry of Development, Industry and Foreign Trade – Armando de Queiroz Monteiro Neto
Email: ministro@mdic.gov.br

- Ministry of Foreign Affairs – Mauro Luiz Icker Vieira
Email: ministro.estado@itamaraty.gov.br

- Ministry of Fisheries and Aquaculture – Helder Zahlut Barbalho
Email: gabinete@mpa.gov.br

CC: Maria Lucia Zaidan Zagli – President-substitute of the CTNBio – and all other members of the CTNBio

Email: ctnbio@mct.gov.br

Your Excellency Ministers, and Ms. President-substitute of the CTNBio,

By way of this letter, we want to express our profound indignation with a possible decision of the CTNBio to authorize the commercial release of genetically engineered (GE) eucalyptus, requested by FuturaGene, a biotechnology company fully owned by pulp and paper company Suzano. Such a decision, which will merely benefit a segment of the country's private sector, could already be taken in the next meeting of the Commission, on March 5, 2015 in Brasilia. If this request is approved, it will be an unprecedented decision, not only for Brazil but also for Latin America and even at the global scale.

The CTNBio does not have sufficient scientific research on the serious impacts that this approval could cause for other equally important sectors of the economy, such as apiculture, in which exports of organic honey account for 80% of national production. The markets that import honey from Brazil require it to be free of GMOs.

Eucalyptus trees are the main source of nectar and pollen for apiculture in Brazil, particularly in the states in the south, southeast and northeast (southern Bahia). Honey contains around 1% pollen and in almost all of the honey

produced in Brazil, eucalyptus pollen accounts for most of the pollen content. According to SEBRAE (2014), Brazil's current honey production is more than 40,000 tons annually, and the sector encompasses 500,000 honey producers, primarily small-scale family farmers, and two million beehives. The honey harvested on eucalyptus plantations is considered to be of high quality and is often classified as organic, as well as being a product of high medicinal and nutritional value. Some 80,000 honey producers operate in partnership with tree plantation companies, occupying approximately 400,000 hectares and 1.3 million beehives (IBGE, 2012). It should be stressed that these figures do not include the small farmers who produce honey for additional income and/or for their own use.

Brazil is the world's 10th largest producer of honey, and 50% of all of the honey produced is exported. The country's biodiversity and natural wealth are reflected in the national apiculture sector, and give rise to unique and distinctive products. The contamination of Brazilian honey would oblige producers to label their export products as containing GMOs, which could lead to their products being banned by other countries.

In addition, a representative of the Ministry of Agricultural Development itself has warned that the studies conducted to assess the effects of eucalyptus on bees and honey production are insufficient, because they took into account only five beehives from a single location. Close to 25% of the honey produced in Brazil comes from eucalyptus, and the research presented by FuturaGene/Suzano does not assess the nutritional aspects of honey produced from GE eucalyptus, nor its toxicity or allergenicity.

CTNBio has an obligation to respect the interests of all sectors of the national economy, as well as the interests of citizens and future generations, before taking a decision on a request that will only benefit FuturaGene/Suzano. If it fails to do so, the Brazilian government will not only be violating national legislation, but also the Convention on Biological Diversity (CBD), to which Brazil is signatory. In particular, any decision to approve the use of GE trees would contradict the precautionary principle, enshrined in the CBD, as well as decision UNEP/CDB/COP/9/IX/5, which states that before making any decision about the commercial release of GMO trees, the governments that are signatories of the convention - in this case the Brazilian government - MUST carry out exhaustive and rigorous risk analyses in all of the Brazilian biomes, and also develop protocols for the total segregation of GMO and non-GMOs, to prevent genetic contamination through seed, pollen or vegetative reproductive materials (e.g. twigs, shoots etc). None of this has been done yet in a thorough and sufficient way.

Serious uncertainties exist with respect to the potential environmental and socio-economic impacts of genetically engineered trees for ecosystems and for different economic activities that depend on biodiversity for their survival. These economic activities generate income, jobs and wealth for Brazil, and should be taken into account by the CTNBio when adopting any decision in response to a request from a single sector.

One single public hearing has been carried out about the issue on September 4, 2014, in Brasilia. It clearly showed the insufficiency of the existing studies. Also at this hearing, a letter was presented to the President of the CTNBio from Brazilian and Latin American organizations (<http://wrm.org.uy/pt/todas-as-campanhas/carta-aberta-a-comissao-tecnica-nacional-de-biosseguranca-ctnbio-do-brasil/>) urging and demanding that CTNBio explicitly do not authorize FuturaGene/Suzano's request. An international solidarity letter by organizations endorsing this demand was also presented at the same occasion. (<http://wrm.org.uy/pt/acoes-e-campanhas/statement-in-support-of-the-open-letter-to-ctnbio/>).

There are many reasons not to authorize this request, additional to the aforementioned risks. FuturaGene's claim of supposed environmental and socio-economic gains are in contradiction with the harm/impacts of the already experienced model of large-scale monocultures, applied for decades in Brazil. The insertion of GE eucalyptus in this model will not alleviate but only worsen the impacts on the environment, biodiversity and indigenous and local communities. The FuturaGene/Suzano claimed benefit of an enhanced yield of more than 20% will only be an incentive to expand this model further, exacerbating its negative impacts instead of reducing them. These impacts include the large-scale application of agrottoxins and the voracious water consumption by eucalyptus monocultures in a country that is facing right now one of its most serious water crises. Besides, many and serious conflicts over access to land already exist and continue increasing, and living conditions of communities surrounded by Suzano's operations have been destroyed to the point that these communities are now struggling to guarantee their food sovereignty and are increasingly at risk of losing their territories. Also, transgenic eucalyptus will specifically impact beekeepers. Because of GMO contamination and the impact on bees; honey exporters will be obliged to label their products, leading to the possibility of suffering caveats from other countries.

Because of all these reasons, we request the Brazilian government through the CTNBio and especially this Ministry to take all measures to not authorize the request of FuturaGene/Suzano for the commercial release of GE eucalyptus, or by any other company that also has, or will present in future, a request for such a release.

Yours sincerely,