

Managing Environmental and Health Risks: the Philippine Biosafety System (focus on the safety and nutritional benefits (Golden Rice and Bt talong))

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Outline

- 01 Philippines Biosafety Regulatory Framework
- 02 Activities that need regulatory approvals
- 03 Current Guidance on Risk Assessment
- 04 Case Studies: Golden Rice
Bt talong



BT Talong

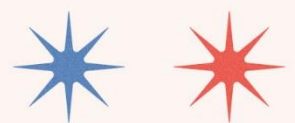
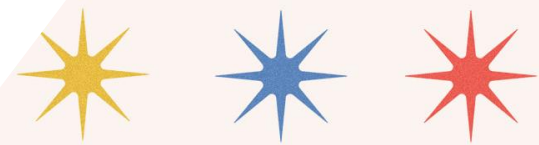
GMO



(DA-BPI) has
granted a permit for
the direct use of Golden
Rice for
July 2021.

**BT Talong is now
approved for Direct
Use as Food, Feed, or
for Processing (FFP)**

The Department of Agriculture - Bureau of Plant Industry (DA-BPI) has granted the permit for direct use as food or for processing (FFP) of BT Talong to the Philippines Los Baños



Golden Rice



HIGH FRUCTOSE
CORN SYRUP



KU
CHAR
DIAPER
MOTRIN
MEAT
FAST FOOD

ARE GMO
FOODS
SAFE?





How do we ensure that GMOs are safe for use and consumption and safe in the environment?



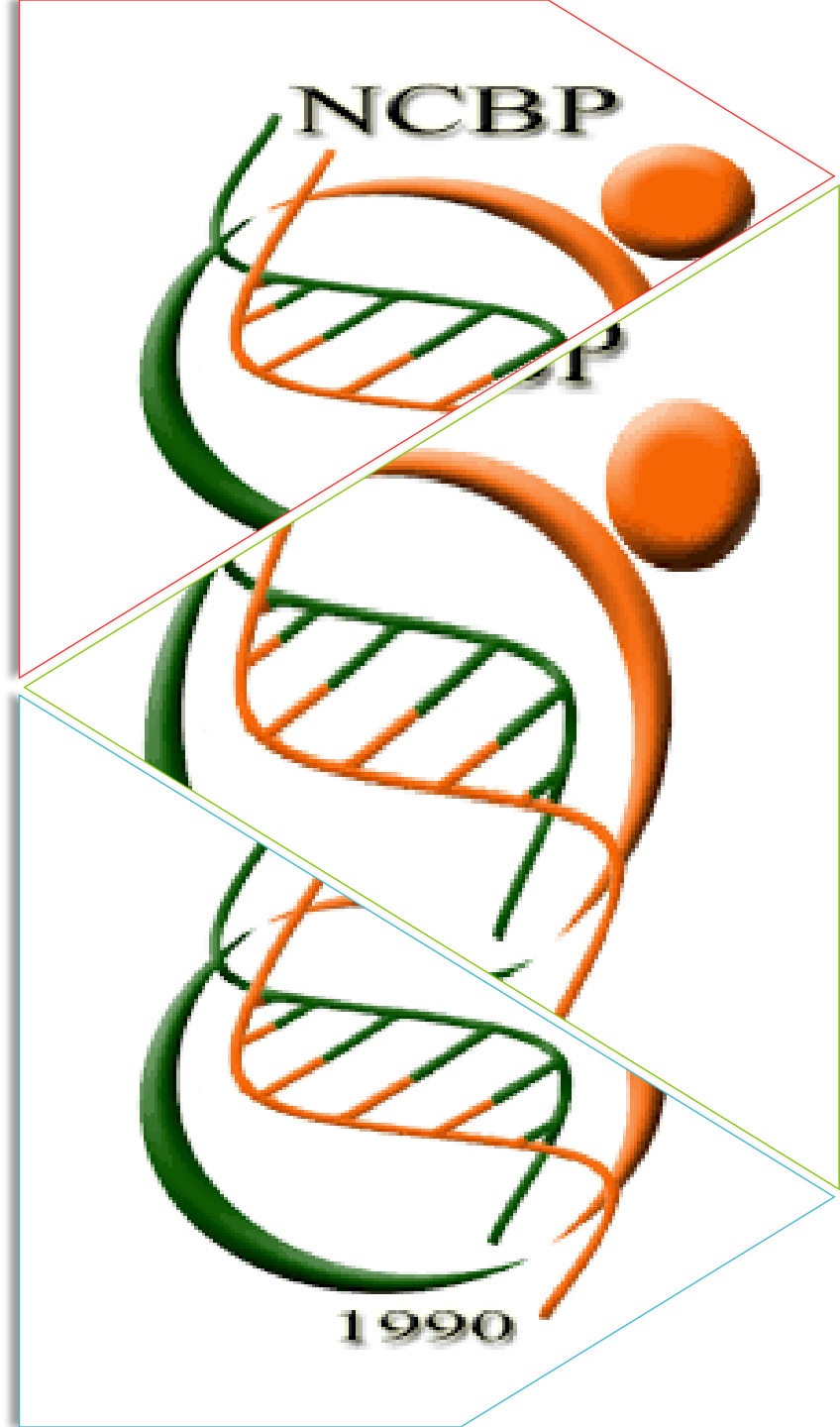
- GMO crops are studied extensively to make sure they are safe for people, animals and the environment
- The Philippine regulatory agencies have rigorously evaluated the food and feed and environmental safety of GMO
- The safety of GMOs has been affirmed by agricultural and food safety regulatory agencies around the world
- Various scientific bodies around the world and a panel of scientists, researchers, agricultural and industry experts reviewed over 20 years of data since GMOs were introduced including around 900 studies and tests and concluded that GMOs are safe to eat



For 31 years, the Philippine Biosafety Regulatory System has been in place to ensure that products of modern biotechnology are used safely and responsibly...

EXECUTIVE ORDER NO. 514

Establishing the **National Biosafety Framework**, Prescribing Guidelines for its Implementation, **Strengthening the National Committee on Biosafety of the Philippines**, and for Other Purposes



NATIONAL COMMITTEE ON BIOSAFETY OF THE PHILIPPINES



“The NCBP shall be the lead body to coordinate and harmonize inter-agency and multi-sector efforts to develop biosafety policies in the country (where such are not already stipulated by law) and set scientific, technical, and procedural standards on actions by agencies and other sectors to promote biosafety in the Philippines; oversee the implementation of the NBF; act as a clearing house for biosafety matters; and coordinate and harmonize the efforts of all concerned agencies and departments in this regard. (Section 4.1)”

Joint Department Circular No. 1, s. 2016

Rules and Regulations for the Research and Development, Handling and Use, Transboundary Movement, Release into the Environment, and Management of Genetically-Modified Plant and Plant Products Derived from the Use of Modern Biotechnology

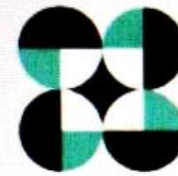
The Department of Science and Technology, Agriculture, Environment and Natural Resources, Health and Interior and Local Government issue this Joint Department Circular governing the research and development, handling and use, transboundary movement, release into the environment, and management of genetically-modified plant and plant products derived from the use of modern biotechnology.



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**DOST-DA-DENR-DOH-DILG
Joint Department Circular¹
No. 01, series of 2021**

Subject: Rules and Regulations for the Research and Development, Handling and Use, Transboundary Movement, Release into the Environment, and Management of Genetically Modified Plant and Plant Products Derived from the Use of Modern Biotechnology

Role of National Government Agencies in the Safety Assessment of GM Crops



Department of Agriculture

Lead in addressing biosafety issues related to the country's agricultural productivity and food security.

Lead in the evaluation and monitoring of regulated articles.



Department of Environment and Natural Resources

Ensure that the applicable environmental assessments are undertaken and potential impacts identified.

Lead in evaluating and monitoring bioremediation, improvement of genetic resources, and wildlife genetic resources.



Department of the Interior and Local Government

Oversee implementation of the activities undertaken in specific LGUs in relation to the conduct of public consultations as required by the Local Government Code.



Department of Science and Technology

Lead in ensuring that the best science is utilized and applied in adopting biosafety policies and in making biosafety decisions

Lead in evaluating and monitoring contained use of regulated articles



Department of Health

Formulate guidelines and review results of assessing the health impacts posed by modern biotechnology.

Lead in evaluating and monitoring processed food derived from or containing GMOs.

Step by step introduction of GM plant into the environment



Activities that need regulatory approvals

Department of Agriculture –
Bureau of Plant Industry



Contained
Use

Confined Test

DOST – Biosafety Committee



Field Trial



Commercialization



Direct Use for
food, feed and
processing



Contained Use/ Confined Test

Section 8. Policy on Contained Use and Confined Test of Regulated Articles. The contained use, including experiments inside laboratory, screenhouse, greenhouse, and glasshouse, and confined test of regulated articles, including risk assessment shall be governed by the DOST-BC in accordance with the Biosafety Guidelines for Contained Use of Genetically Modified Organisms.

Laboratory and Greenhouse Tests

Why perform laboratory and greenhouse trials?
What are the issues/concerns?



Field Trial



SECTION 10. Policy on Field Trial of Regulated Articles.

No regulated article shall be released into the environment for field trial unless a Biosafety Permit for Field Trial has been secured in accordance with this Circular.



Only regulated articles that satisfactorily passed the process on contained use or confined test supervised and officially endorsed by DOST-BC may be subject of application for a Biosafety Permit for Field Trial.





Field Trials

- What are the objectives of conducting field trials?
- What are the safety concerns?
- Basis of approval?



Field Trials

- **Risk assessment are focus on:**
- Measures to prevent unintended dispersal of seeds/plants
- Measures to prevent unintended pollen flow
- Measures to prevent the crop from persisting or re-seeding after the trial is completed
- Effect to environment/NTOs



Field Trials

3 Pillars of Confinement:

-
1. prevent the new genes (contained in pollen, seeds or any other part of the plant) from escaping the trial site

 2. prevent the GM plant material from being consumed by humans or livestock

 3. prevent the GM plant materials from escaping, establishing and persisting in the environment

Commercial Propagation

SECTION 15.
Policy on
Commercial
Propagation
of
Regulated
Articles. No regulated article shall be released for commercial propagation unless:

- a Biosafety Permit for Commercial Propagation has been secured;
- based on field trial, the regulated article does not pose greater risks to biodiversity, human and animal health than its conventional counterpart;
- food and feed safety studies show that the regulated article does not pose greater risks to biodiversity, human and animal health than its conventional counterpart; and
- if the regulated article is a pest-protected plant, its transformation event that serves as plant-incorporated protectant (PIP) has been duly registered with the Fertilizer and Pesticide Authority (FPA).





Environmental issues:

- Gene Flow
- Changes in Levels of Weediness or Invasiveness
- Horizontal Transfer of Engineered Traits to Other Species
- Biodiversity
- Impact on Non-Target Organisms

Direct Use for Food, Feed or for Processing

SECTION 20. Policy for the Direct Use of Regulated Articles for Food and Feed, or for Processing.

No regulated article, whether imported or developed domestically, shall be permitted for direct use as food and feed, or for processing, unless:

- a Biosafety Permit for Direct Use has been issued by the BPI;
- in the case of imported regulated article, the regulated article has been authorized for commercial distribution as food and feed in the country of origin; and
- regardless of the intended use, the regulated article does not pose greater risks to biodiversity, human and animal health than its conventional counterpart.



??? to answer in the assessment process...

- Do the donor and recipient organisms have a history of safe use?
- Are the new substances produced e.g. proteins safe to consume?
- Have potential allergens been introduced into or increased in the food?
- Are there changes in the content of other important substances e.g. toxicants, anti-nutrients?
- Has the composition and nutritional value changed?
- In what forms will the food or food products derived from it be consumed?
- Do the newly introduced substances survive processing, shipment, storage, and other preparation?
- What is the expected human dietary exposure?
- If an antibiotic resistance or other selectable marker is present, is it safe?





CURRENT GUIDANCE ON RISK ASSESSMENT

Safety Assessment

Basic Concepts



COMPARATIVE SAFETY ASSESSMENT

Regulatory Data & Information for Comparative Assessment

Gene/protein safety

Environment
Food/Feed Safety

Crop Safety

Gene(s) & Introduced Genetic Material

- Source(s)
- Molecular characterization of insert sequence/ copy #/ integrity / no backbone/generational stability



Agronomic Equivalence

- Growth, Morphology
 - Yield , Fitness
 - Susceptibility to pests, pathogens
- Cultivation practices



Protein(s)

- History of safe use and consumption
- Function / specificity / mode of action
- Amino acid sequence
- Levels
- Potential toxicity or allergenicity



Food / Feed Composition

- Proximate analysis
 - Key nutrients
 - Key anti-nutrients
 - Key metabolites



ENVIRONMENTAL RISK ASSESSMENT

- *Establishing an Environmental Impact Statement System (P.D. 1586)*
 - *Project Description Report*
 - *Location and Description of Receiving Environment*
 - *Risk exposure*
 - *Environmental Management Plan (potential impact and mitigating measures)*
- *Environmental Risk Assessment*
 - *Persistence and invasiveness*
 - *Gene flow*
 - *Impact on biodiversity*
 - *Effects on non-targets*



The Cartagena Protocol on Biosafety



DOST-DA-DENR-BIOS-DILG
Joint Department Circular
No. 1, series of 2015

Subject: Rules and Regulations for the Research and Development, Handling, and Use, Transboundary Movement, Release into the Environment, and Management of Genetically Modified Plant and Plant Products Derived from the Use of Modern Biotechnology

WHEREAS, the Constitution protects the rights of the people to life, to health and to a balanced and healthful environment;

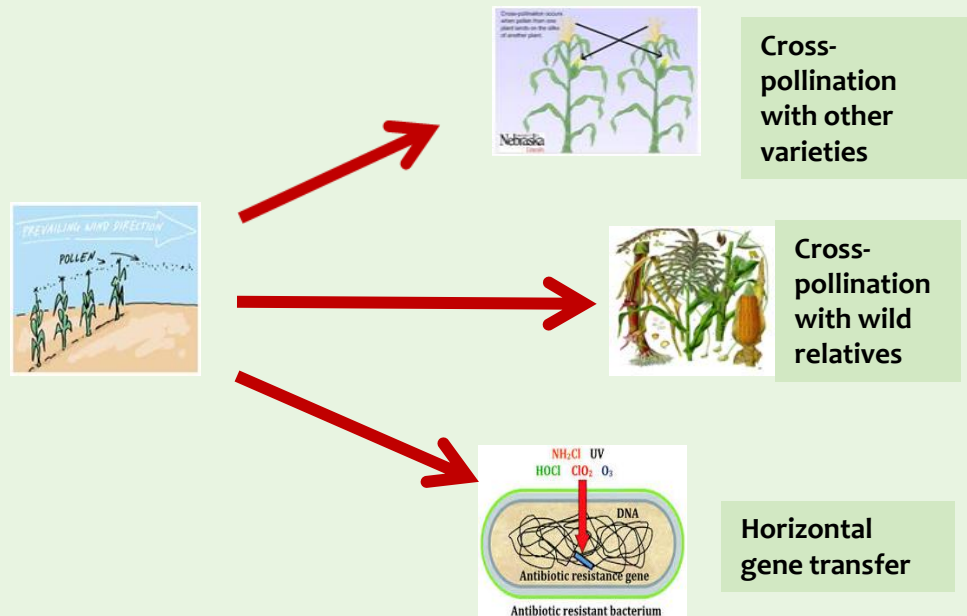
WHEREAS, the Philippines is a party to the United Nations Convention on Biological Diversity and its Cartagena Protocol on Biosafety;

WHEREAS, the President issued Executive Order (E.O.) No. 514, series of 2004, "Establishing the National Biotechnology Framework, Promoting Guidelines for its Implementation, Strengthening the National Committee on Biotechnology of the Philippines, and for other purposes" to guide the development, adoption, and implementation of all biotechnology policies, measures and guidelines and in making

ENVIRONMENTAL RISK ASSESSMENT

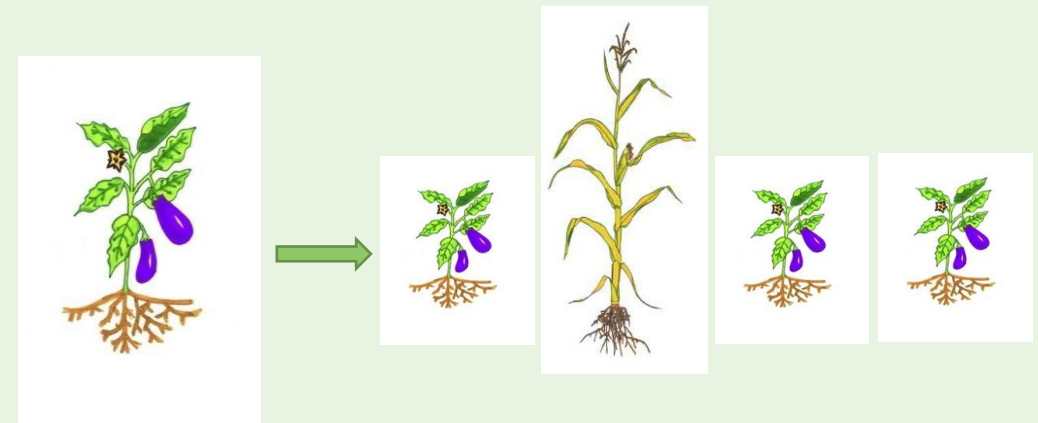
Gene flow

❖ Transfer of inserted genes



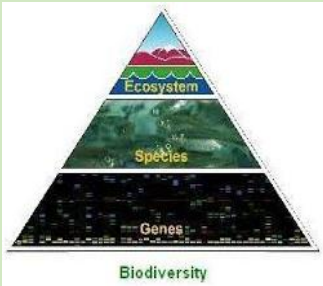
Weediness (invasive)

- What are the key concerns?
 - Increased weediness
 - The GM plant could be more invasive in natural habitats
 - Volunteers of the GM plant may be more difficult to control in the production field in subsequent years



ENVIRONMENTAL RISK ASSESSMENT

Biodiversity

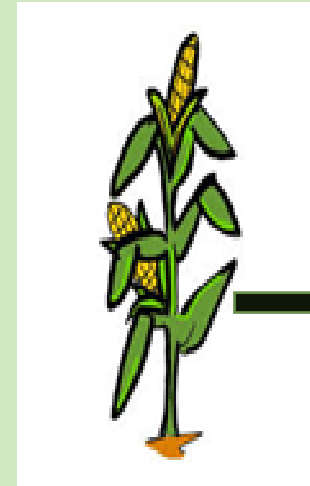


- Consider:
 - The receiving environment
 - Native flora and fauna
 - Agricultural crops
 - Farm animals



Effects on NTOs

- What are the key concerns?



Toxic to non-target organisms (NTOs) that provide valuable ecosystem functions (pest control, pollination, decomposition, etc)



The GM plant could be toxic to valued NTOs outside the agricultural field



PIP tested against family/group representative or sentinel or indicator species

FOOD AND FEED SAFETY ASSESSMENT

- CODEX Alimentarius Guidelines
- Organization of Economic Cooperation and Development (OECD)
- FAO-WHO Food Safety Risk Analysis Guide
- DOH-Health Impact Assessment

What is 'Substantial equivalence' ? : Key Element

➤ It is widely accepted that the best approach to begin the safety assessment of GM food and feed is a comparative approach.

➤ According to this principle, if a new food or feed derived from a GM crop is shown to be substantially equivalent to its conventional counterpart, then it is considered to be as safe as the food or feed from the conventional crop, and the assessment then focuses on the safety of the introduced traits (Codex Alimentarius, 2003b).

Assessment of whole foods

Based on the principle of "substantial equivalence", i.e. **as safe as** the conventional counterpart

Toxicity ?
Composition ?
Allergenicity ?
Nutritional value ?



Plant Biotechnology



Comparative Assessment = Substantial Equivalence

A) Description of the recombinant-DNA plant;

B) Description of the host plant and its use as food;

C) Description of the donor organism(s);

D) Description of the genetic modification(s);

E) Characterization of the genetic modification(s);

F) Safety assessment:

a) expressed substances (non- nucleic acid substances);

b) compositional analyses of key components;

c) evaluation of metabolites;

d) food processing;

e) nutritional modification; and

G) Other considerations.

Toxicity

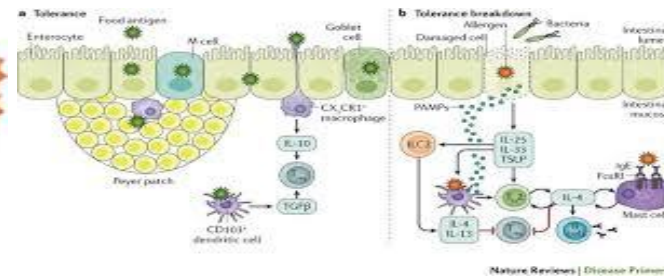
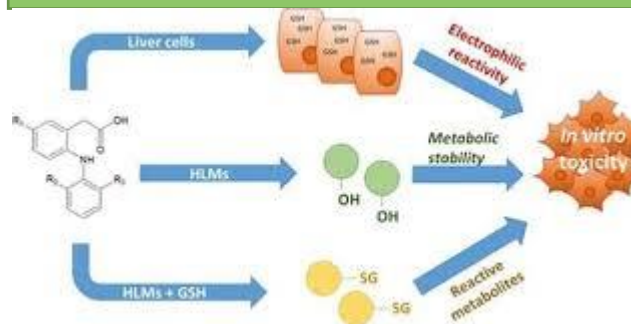
- History of safe use
- Amino acid sequence similarity between the new protein and known protein toxins and anti-nutrients
- Resistance to digestion of the new protein

Allergenicity

- Source of the newly expressed protein
- Amino acid sequence similarity
- Physico-chemical properties of the newly expressed protein
- Specific serum screening

Compositional Analysis/Nutritional Considerations

- Unintended changes in food composition:
 - Key nutrients
 - Natural toxicants
 - Anti-nutrients
- Dietary exposure assessment

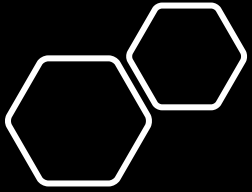


SOCIO-ECONOMIC, ETHICAL & CULTURAL CONSIDERATIONS

- Productivity (yield)
- Cost efficiency
- Net farm income (profitability)
- Trade (import substitution)
- Global competitiveness

Sample Countries Legislation Socio-economic Considerations

Country	Party CBD	Party CPB	Conduct Confined Field Trials	Approvals for Comm.	Language of relevant text considering socio-economic considerations	Relevant Regulation
Argentina	Y	N	Y	Y	Decision on the convenience of the commercialization the genetically modified material over its impact on markets, in charge of the National Market Directorate, so as to avoid potential negative impacts on Argentinean exports.	<i>Resolution of SAGyP Resolutions and n°5700. SAGPyA</i>
Brazil	Y	Y	Y	Y	Article 48, Paragraph 1. The National Biosafety Council – CNBS shall: II- analyze, upon request by CTNBio, in the context of convenience, socioeconomic opportunity and national interest, requests to grant license on the commercial use of GMO and GMO derivatives; Article 50. CNBS shall decide, upon request by CTNBio, on matters of socioeconomic convenience and opportunity and national interest on the granting of a license for GMO and GMO derivatives commercial license.	<i>Decree NO. OF November 2005</i>
Honduras	Y	N	Y	Y	Socio-economic considerations will be conducted through partial studies that should include different social and economic impacts	<i>Honduras d</i>
Kenya	Y	Y	Y	N	"in reaching a final decision, the Authority shall take into account ... (e) socio-economic consideration arising from the impact of the GMO on the environment."	<i>Kenya draft</i>
Uganda	Y	Y	Y	N	"no approval shall be given unless the GMO will not have adverse socio-economic impacts."	<i>Uganda dra regulations</i>
Nigeria	Y	Y	N	N	The decision-making procedures shall take into consideration risk assessment, which involves scientific, socio-economic, cultural and ethical considerations.	<i>Nigeria Nat Biosafety F 2005.</i>
Philippines	Y	Y	Y	Y	"The Council may in performing its function in terms of sub regulation (8), consider the socio-economic impact that the introduction of a genetically modified organism may have on a community living in the vicinity of such introduction"	<i>GMO Act 15 No. 15 of 15</i>
India	Y	Y	Y	Y	"Socio-economic, cultural and ethical considerations. Impacts on small farmers, indigenous people, women, small and medium enterprises, and the domestic scientific community to be taken in to account."	<i>Executive O (EO514)</i>



Case study: Golden Rice Beta-carotene enriched



Table 6. Potential Contribution of Rice Containing Event GR2E to Meeting Vitamin A Needs in Bangladesh and the Philippines

	mean daily rice consumption (g, raw) ^a	EAR ^b (μg/day RAE) ^c	RDI ^d (μg/day RAE)	β-carotene equiv ^e from GR2E Rice (μg/day)	% of EAR ^f	% of RDI ^f
Bangladesh						
preschool-aged children	157	210	300	561	89	62
school-aged children (6–14 years)	261	275	400	932	113	78
nonpregnant, nonlactating women (15–49 years)	360	500	700	1285	64	46
Philippines						
preschool-aged children (6 months–	100	210	300	357	57	40

THE GOLDEN RICE PROCESS



Contained experiment



- DOST-BC Ref No. 2005-0193: Development of elite indica golden rice cultivars with levels of provitamin A carotenoids
- Date Applied: 4 April 2005
- Date Approved: 24 May 2005
- Biosafety consideration: transgenic plants will have no adverse effect on the environment for the period of experiments
- Biosafety measures to be taken:
 - The tested plants will be kept in isolation in the CL4 transgenic greenhouse to prevent access of unauthorized personnel;
 - The plant materials for disposal will be placed in sealed plastic bags;
 - The plants grown in CL4 will be destroyed and the pots and soil will be autoclaved at high temperatures and high pressure;
 - The plant material from screenhouse (CS07) will be disposed through burning of straw;
 - CS07 would be kept under lock;
 - CS07 facility is adequate to prevent rats, birds, etc.;
 - Transgenic seeds harvested from CL4 and CS07 will be kept in hermetically sealed aluminum foil packages and stores in locked refrigerators designated for storage of transgenic seeds in TCGE Laboratory of IRRI. Movement of all materials will be done in compliance with all relevant biosafety and phytosanitary requirements of the Philippines

Confined tests

“Production of plant materials for compositional analysis and for other biosafety tests of Golden rice event GR2E under confined test conditions in the Philippines”

PhilRice-Batac Brgy.
Tabug, City of Batac
(DOST-BC Ref. No.
2015-0290)

Date Applied:
1 April 2015
Date Approved:
15 May 2015

PhilRice-CES Brgy.
Maligaya, Muñoz,
Nueva Ecija
(DOST-BC Ref. No.
2015-0291)

Date Applied: 7 April
2015
Date Approved:
8 May 2015

PhilRice-Isabela
Brgy. Malasin, San
Mateo, Isabela
(DOST-BC Ref. No.
2015-0292)

Date Applied: 1 April
2015
Date Approved: 14 May
2015



Conditions for approval:



- ✓ At least 150 meters physical or temporal reproductive isolation of the GMO shall be observed at all times;
- ✓ All confinement measures should be in place before the actual transplanting of rice seedlings;
- ✓ The proponent shall ensure that only authorized personnel are allowed inside the test site;
- ✓ The proponent shall ensure that rodent control measures are in place and that stray animals are excluded from the test site while trials are being conducted;
- ✓ The proponent shall ensure the security of the trial, the field workers and the monitors;
- ✓ In case of undue destruction of the experimental materials, the proponent should implement measure to prevent inadvertent escape of any viable materials;
- ✓ The rice grains or any plant part shall not be eaten or fed to humans, wildlife and livestock;
- ✓ A disposal pit shall be provided within the test site;
- ✓ The harvested grains shall be properly labeled and stored at the designated seed storage facility, while plant materials and other plant debris should be buried in a pit or plowed under;
- ✓ The proponent shall leave the test site fallow for at least 30 days. Emergence of volunteer plants shall be monitored and shall be uprooted and disposed

TABLE 4 | Agronomic performance of BRRI dhan29 GR2E NILs

Parameter	SHT 2009 (n = 11)		
	BC ₃ F ₄ NILs (avg ± SD)	BRRI dhan29	Mean difference
Days to maturity	125.4 ± 2.1	125.5	0.9
Plant height	102.5 ± 6.8	104.1	-1.6
Panicles/hill	10.4 ± 0.8	9.7	1.0*
Panicle length	26.6 ± 1.0	27.8	-0.9
Flag leaf length	40.9 ± 3.5	43.2	-2.3
Flag leaf breadth	2.2 ± 0.1	2.2	-0.0
Spikelets/panicle	269.6 ± 60.5	257.7	11.9
% spikelet sterility	39.1 ± 13.6	31.2	7.9
1000-grain weight	19.1 ± 0.7	19.9	-0.8
Grain yield/plant (g)	20.0 ± 5.4	23.6	-3.6
Grain yield (t/ha)	-	-	-
Grain length (mm)	8.3 ± 0.1	8.5	-0.2
Grain breadth (mm)	2.4 ± 0.1	2.5	-0.1
LB ratio	3.4 ± 0.1	3.6	-0.2
Milling yield (%)	77.5 ± 10.2	66.1	11.4
Head rice yield (%)	54.9 ± 16.9	58.2	-3.3
Amylose (%)	21.3 ± 0.4	30.3	-9.0**
Total carotenoids (µg/g)	6.42 ± 0.56	-	-
Range of TC (µg/g)	5.8-7.6	-	-

TABLE 5 | Yield and grain quality attributes of selected BC₃F₄ NILs of GR2-E BRRI dhan29.

Designation	DM	PH	GL	GW	TGW	YLD
12062 GR 2-E:14-40-7-8	147	112	8.4	1.8	21.8	7.2
2062 GR 2-E:14-40-7-16	151	105	8.5	1.7	21.1	7.1
180 GR 2-E:2-9-89-16	144	108	8.4	1.8	20.4	7.5
10 GR 2-E:2-17-36-10	146	105	8.3	1.8	20.9	7.0
GR 2-E:14-40-7-21	145	112	8.4	1.8	20.2	7.8
16R 2-E:2-7-63-1	147	108	8.6	1.8	20.9	7.3
12-E:14-40-7-23	143	103	8.5	1.8	20.8	7.4
17-E:2-7-63-2	145	105	8.4	1.8	21.3	7.8
1	148	108	8.8	1.8	21.4	7.0
	3.1	2.8	0.24	0.24	1.44	0.7

PH, Plant height (cm); GL, Grain length (mm); GB, Grain width (mm); TWG, Thousand grain weight (g); YLD, Yield content at 2 months after harvest; Tr, Translucent; Ck, Check; LSD, Least significant difference.

173.9 ± 11.2
58.3 ± 8.1

11.9 ± 4.3

24.0 ± 2.4
27.9

10.16 ± 0.23

5.25-19.36



SHT, Screen house trial; CFT, confined field trial

*Significant at 5 and 1% level of probability, respectively

Multi-location field trial

Biosafety Permit for Field Trial Number 19-001:
“Field Trial to Generate Data for Environmental
Biosafety Risk Assessment of Beta-Carotene
Enriched “Golden Rice” Event GR2E in the
Philippines”

Date Applied: February 28, 2017

Date Approved: May 20, 2019



at concerned national agencies,
Maligaya, Science City of Muñoz,
Isabela, subject to the following

shall ensure that the area shall be flooded after
area may be re-used for the second season planting
after successive ten (10) day monitoring interval;
Director of BPI, within the time periods and in the
any of the following occurrences:
y, not exceeding twenty-four (24) hours, through verifiable
on (email, text message, etc.), in the event that new
available indicating that the regulated article could pose
odiversity, human and animal health than its conventional
on as possible, but not to exceed three (3) working days, if the
or associated host organism is found to have characteristics
different from those listed in the application, or suffers from any unusual
e.g., excessive mortality or morbidity, unanticipated effect on non-target
);
at shall strictly comply with the additional requirements that the BPI may
necessary, during the trial period;
ponent shall strictly adhere to the provisions of DA MC No. 02 Series of 2000
nes on the conduct of field test of plants derived from modern biotechnology”; and
roponent shall comply with the reportorial requirements as discussed in Section 38
A and B of the DOST-DA-DENR-DOH-DILG Joint Department Circular No. 1 series of
16.

is permit is valid for a period of two (2) years from the time of issuance subject to extension
s maybe necessary to complete the field trial, unless sooner revoked for any of the reasons set
forth in Article V Section 11 Item L of the DOST-DA-DENR-DOH-DILG Joint Department Circular
No. 1 series of 2016

Field Trial Risk Assessment

- **History of Safe Use:**
 - Rice has a long history of safe use as food and has not been found to be allergenic nor a source of toxicants
- **Characteristics of the Host Plant:**
 - Rice is grown throughout the Philippines and worldwide and how it is cultivated by populations dependent on rice has defined the habitat and ecology of the plant and other agronomic characteristics. Cultivated rice varieties do not have weediness characteristics
- **Characterization and safety assessment of the GM product:**
 - The genetic change in the accumulation of provitamin A in the GR2E rice endosperm is not expected to affect or alter the reproductive biology of the crop
- **Proposed field Trial Site:**
 - The sites were representatives of the receiving environment for GR2E for collecting relevant agronomic and phenotypic data. The sites are under the care and control of PhilRice which will facilitate compliant management of the proposed activities
- **Environmental Risk Assessment (DENR):**
 - Field trial of GR2E is safe to the environment and biodiversity, no known allergens nor potential toxicity; low chance of interbreeding or genetic exchange (0.08-0.92%) with conventional counterpart or with other species
- **Environmental Health Risk (DOH)**
 - Field trial is acceptable subject to monitoring based on compliance with (EHIA)
- **Socio-economic, ethical and cultural concerns (SEC Expert)**
 - GR2E is being developed to address serious health problem posed by vitamin A deficiency in the Philippines. No changes required to farm management practices relative to the non-GM variety

GR2E for Direct Use as Food, Feed or for Processing



Date Applied: February 28, 2017

Date Approved: December 10, 2019

Permit for Direct Use as Food and Feed, or for Processing Number 19-060FFP

and licensed by Philippine Rice Research Institute (PHILRICE) and
Research Institute (IRRI), with office addresses at PHILRICE Central
Malligaya, Science City of Munoz, Nueva Ecija and Pili Drive, University
Los Banos, Los Banos, Laguna, respectively, has undergone satisfactory
ment for the issuance of biosafety permit for direct use as food and feed, or
pursuant to the DOST-DA-DENR-DOH-DILG Joint Department Circular No. 1
and found to be as safe as conventional rice.

Committee shall take appropriate measures to prevent accidental and unintentional
reproduction and its recurrence and thereby protect human and animal health
the environment. A Plant Quarantine Officer and his/her duly authorize
representatives shall be allowed access during regular business hours to the facility where
regulated article is located and to any records relating to the importation of the
regulated article, if applicable.

Issued on December 10, 2019 at the Bureau of Plant Industry, San Andres St., Malat
Manila subject to conditions stated at the back of this permit, and shall expire
December 9, 2024.

Provitamin A Biofortified Rice Event GR2E

Supporting Information for the Risk Analysis Report for a Genetically Modified Plant for Direct use as Food, Feed, or Processing

SUBMITTED TO

Bureau of Plant Industry, Ministry of Agriculture
 Department of Agriculture
 692 San Andres St., Malate
 Manila 1004 Philippines

SUBMITTING ORGANIZATIONS

Philippines Rice Research Institute (PhilRice)
 PhilRice Central Experimental Station
 Maligaya, Science City of Munoz, 3119 Nueva Ecija
 Philippines
 – and –
 International Rice Research Institute (IRRI)
 Pili Drive, UPLB, Los Baños, 4031, Laguna
 Philippines

3. The Genetic Modification

3.1. Transformation Method

The *Agrobacterium*-mediated transformation of the japonica rice cultivar Kaybonnet using plasmid pSYN12424 was previously described by Paine et al. (2005). Briefly, embryogenic cultures were established from mature embryos on Murashige and Skoog basal salt mixture (MS)-callus induction medium (CIM) (4.3 g/l MS salts, 5 ml/l B5 vitamins, 30 g/l sucrose, 500 mg/l proline, 500 mg/l glutamine, 300 mg/l casein hydrolysate, 2 mg/l 2,4-D, 3 g/l Phytigel, pH 5.8). Embryogenic calli (3–4 mm) were inoculated with *Agrobacterium tumefaciens* harbouring plasmid pSYN12424 and incubated at 22°C for two days, followed by transfer onto MS-CIM media containing ticarcillin (400 mg/l), and then onto mannose selection media (MS-CIM containing 17.5 g/l mannose, 5 g/l sucrose, and 300 mg/l ticarcillin) for five weeks in the dark. Proliferating colonies were transferred to regeneration medium (MS CIM with 0.5 mg/l indole acetic acid, 1 mg/l zeatin, 200 mg/l ticarcillin, 20 g/l mannose, 30 g/l sorbitol, no sucrose), grown in the dark for 14 days and then moved to light at 30°C for 14 days. Shoots were transferred to MS medium containing 20 g/l sorbitol for two weeks and then to soil.

3.2. Description of the Potentially Introduced Genetic Material

Agrobacterium-mediated transformation was performed using plasmid pSYN12424 (Figure 3), which contains three gene expression cassettes within the T-DNA (Figure 4). These gene expression cassettes are briefly described below, and summarized in Table 4.

The first cassette contains a copy of the *cr1* gene from *Pantoea ananatis* (Misawa et al., 1990) that is fused in-frame at the 5' terminus with the pea (*Pisum sativum*) RUBISCO S5U transit peptide encoding sequence (Coruzzi et al., 1984). Transcription of the *cr1* gene is controlled by the rice *GluA-2* promoter (Takaiwa et al., 1987) for targeted expression of *cr1* gene. *cr1* gene is provided by the

2. History of Use of the Host and Donor Organisms

2.1. Host Organism

Rice is the common name for the plant *Oryza sativa* L., which has a long history of use as food dating back at least 4000 years. Rice is used in various forms including whole and milled grain, flour and bran. The husks may be used for fertilizers and animal feed as well as for fibre production. Numerous varieties of rice have been developed from subspecies indica, japonica, and javanica. Over 90 percent of rice production and consumption is in Asia, with around five percent from the Americas, three percent from Africa and another one percent from Europe and Oceania. The crop is well adapted to diverse growing conditions from cool climates to deserts (with irrigation) and is able to perform well in areas with saline, alkaline, or acid-sulphate soils.

2.1.3. Key Nutrients and Anti-Nutrients

Brown, milled, polished, and parboiled rice are commonly consumed by humans in the form of grain after being cooked. Rice is also used in food manufacturing including in

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6. Protein Safety

As a macronutrient, protein is an essential component of the human diet and, although individual proteins mediate a diverse range of biological functions, consumption of proteins as a class of dietary substances is not inherently associated with adverse effects (FAO/WHO, 1996). Only a small number of dietary proteins have the potential to exert anti-nutritional or toxic effects, or elicit allergic reaction in previously sensitized individuals.

Assessing the safety of newly-expressed proteins produced in the edible portion of a genetically engineered food crop is an integral component of the overall safety assessment. As there is currently no single criterion that is sufficiently predictive of potential allergenicity, a “weight-of-evidence” approach is recommended for hazard assessment that considers the history of use, amino acid sequence similarity to known allergens, function or mode of action, digestibility under standardized conditions, stability to heat or processing, and expression levels and potential dietary exposure (Codex, 2003; Delaney et al., 2008). Conventional toxicology studies are not considered sufficient where the newly-expressed protein, or a closely related one, has been consumed in food at equivalent intakes or where the new substance is not present in food at equivalent intakes (Codex, 2003; HC, 2006). Only when a potential for hazard has been identified when the previous assessment does not permit a determination of safety, is further characterization warranted (Delaney et al., 2008; Hammond et al., 2013). Further characterization may include appropriate oral toxicity studies or other types of toxicology studies when the protein’s biochemical function suggests it may be expected to be toxic to non-target organisms.

A tiered “weight-of-evidence” approach was followed in assessing the safety of the CR1, and PMI proteins expressed in GR2E rice, and is described in the following

4. Molecular Genetic Characterization of GR2E Rice

Southern blot analyses (Southern, 1975) were performed to investigate the number of sites of insertion of the pSYN12424 T-DNA, the integrity of introduced genetic elements, the absence of plasmid backbone sequences, and the multi-generational stability of the inserted DNA (Cueto et al., 2016). A complete description of the methods used, including locations and identities of various hybridization probes, is presented in Appendix A, beginning on page 99.

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Event IR-00GR2E-5 11

MOLECULAR CHARACTERIZATION

4.1. Insert Copy Number within the GR2E Rice Genome

2.1.5. Allergy

Rice is not considered by allergists to be a common allergenic food. Although nearly one-half of the world population consumes cooked rice on a daily basis, published evidence indicates that food allergy to rice is rare. However, rice allergy has been reported in countries of Asia including Japan, Malaysia, Thailand, and Indonesia and in some European countries including Finland, France, Spain, Sweden, Denmark, Estonia,

7. Compositional Analysis

For new varieties without purposefully altered nutritional properties, which includes the vast majority of currently authorized genetically modified crops, the compositional assessment is part of the weight-of-evidence approach for evaluating whether there were any unanticipated consequences of the genetic modification. The experience with genetically modified crop plants with introduced traits conferring insect-resistance and/or herbicide-tolerance has indicated that the incorporation of these traits has little biologically meaningful impact on the composition of key nutrients and anti-nutrients (Harrigan et al., 2010). As with products of conventional plant breeding, most compositional variation is due to environmental and agronomic factors, and the base genetics of the plant variety (Harrigan et al., 2007; Ricoch, 2013).

The compositional evaluation of crops intentionally modified to express altered nutritional properties is intended to determine whether the composition differs significantly from its traditional counterpart aside from the intended change in nutrient composition and to assess the safety of the intended change and any unintended changes. Nutritionally improved varieties may be expected to contribute significant new sources of dietary nutrients or other bioactive phytochemicals. To assess the safety and nutritional impact of these products, it is important to have knowledge of how much of these products will be consumed in the overall human diet or in animal feeds. The safety and nutritional quality of these products can only be assessed in the context of their proposed uses and consequent intake.

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Commercial Propagation

- *Date Applied: October 24, 2021*
- *Date Approved: July 2021*
- *Biosafety Permit Number: 21-012 Propa*




Republic of the Philippines
Department of Agriculture
BUREAU OF PLANT INDUSTRY
692 San Andres St., Malate, Manila

Biosafety Permit for Commercial Propagation Number 21-012Propa

GRZE Rice owned and licensed by Philippine Rice Research Institute, with office address at PhilRice-Central Experiment Station, Maligaya, Science City of Muñoz, Nueva Ecija, has undergone satisfactory biosafety assessment pursuant to the DOST-DA-DENR-DOH-DILG Joint Department Circular No. 1, Series of 2016. This permit is hereby issued for propagating the seeds of the said regulated article. Further, the permittee has satisfactorily complied with all requirements for the issuance of biosafety permit for commercial propagation.

Issued on July 21, 2021 at the Bureau of Plant Industry, San Andres St., Malate, Manila subject to conditions stated at the back of this permit, and shall expire on July 30, 2026.


GEORGE Y. CULASTE, PhD
Director
Bureau of Plant Industry

Risk Assessment

Safety considerations:

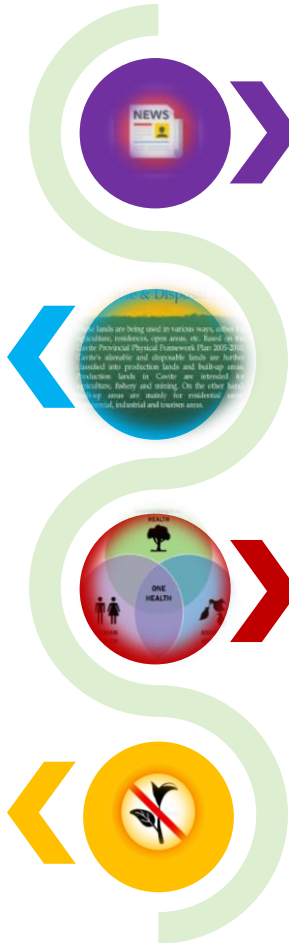
- ✓ General Description including taxonomy and morphology
- ✓ Centers of origin, geographical distribution and agronomic practices
- ✓ Reproductive biology
- ✓ Genetics
- ✓ Hybridization and introgression
- ✓ Various interactions with other organisms (ecology)



Biosafety Permit Conditions

Limitation of planting and/or commercial propagation within agricultural lands, classified as Alienable and Disposable (A&D lands)

Should not be planted in areas where the local government unit has a known policy or ordinance prohibiting entry or propagation of any GMO. Should be labeled “not intended for propagation in prohibited areas”



Inform the public by publishing in any of the top three leading newspapers



In the event new information becomes available indicating that GR could pose greater risks to biodiversity, human and animal health, necessary measures to protect human health and the environment should be undertaken

Case study: *Bt* eggplant

(resistant to eggplant fruit and shoot borer)

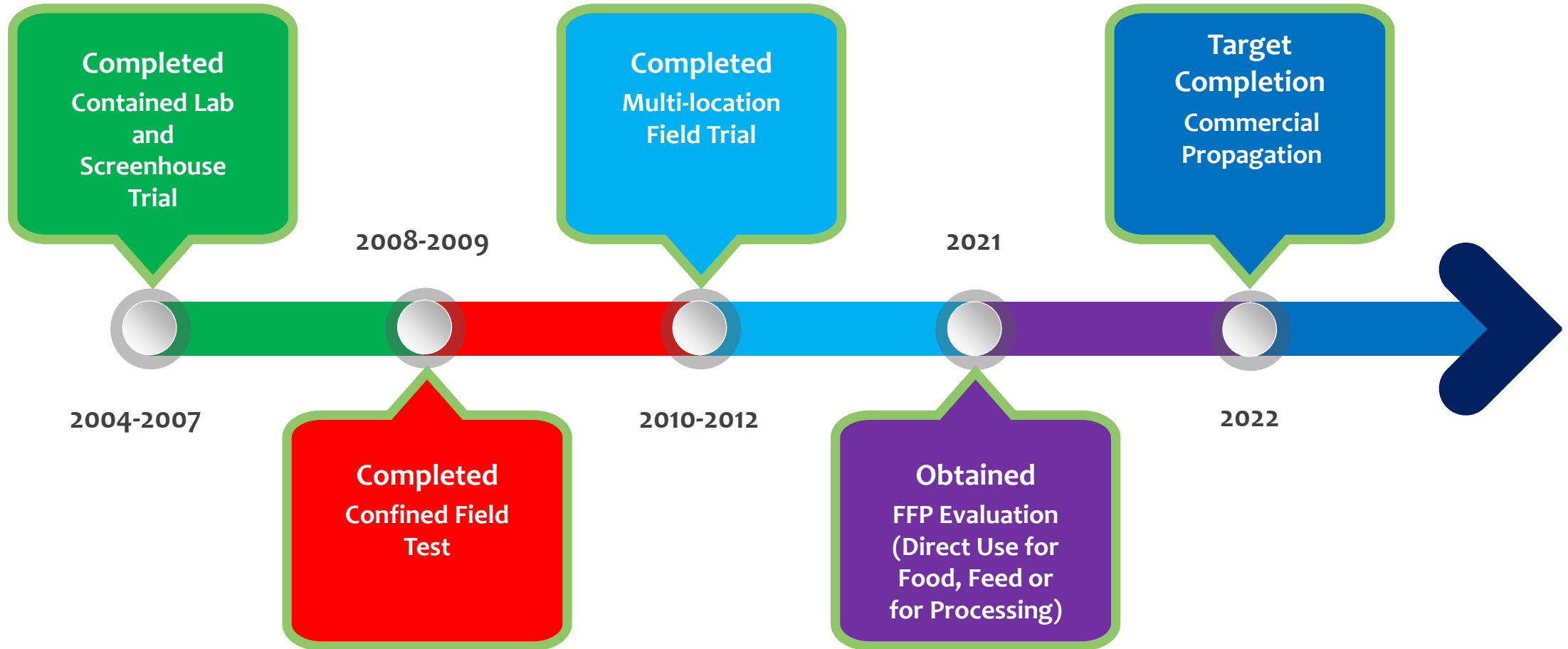
What are the regulatory stages in the development of *Bt* talong?



  AngBagongTalong

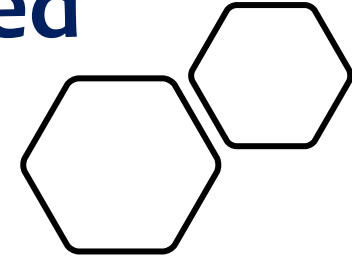
#BtEggplant
#AngBagongTalong
#Biotek

Timeline of *Bt* eggplant Development





Contained Use



- Development and Commercialization of Fruit and Shoot Bt Gene into – BL2 Greenhouse Philippine Eggplant Varieties; contained experiment at IPB
- Completed March 2007

- Development and Commercialization of Fruit and Shoot -Resistant Bt Eggplant: Generation Advancement of Backcross Selections with Mahyco Transformation Event EE -1 and Development of Experimental Hybrids; contained experiment IPB BL2 Greenhouse
- Completed 2009

Confined Field Test

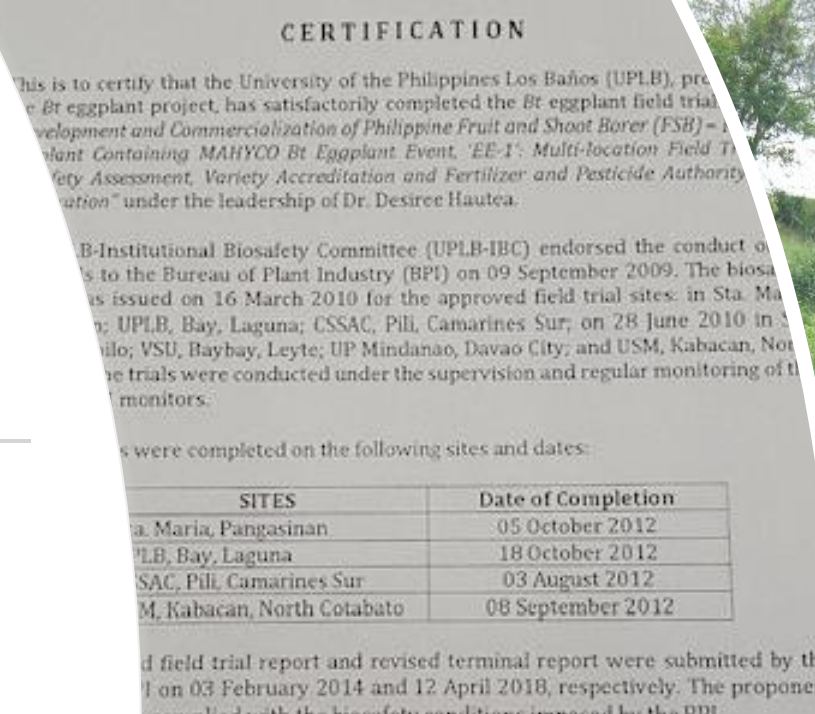


Limited Confined Field Trial (CFT) (2008-2009)

- Development and Commercialization of Fruit and Shoot Borer-Resistant Eggplant: Confined Trial of BC₃F₁ Line Selections with Mahyco Transformation Event EE -1 for – test IPB Experiment Station
Evaluation of: horticultural and nutritional; confined field Further Generation Advance and Line Selection
- Completed May 28, 2008

Multi-location Field Trial

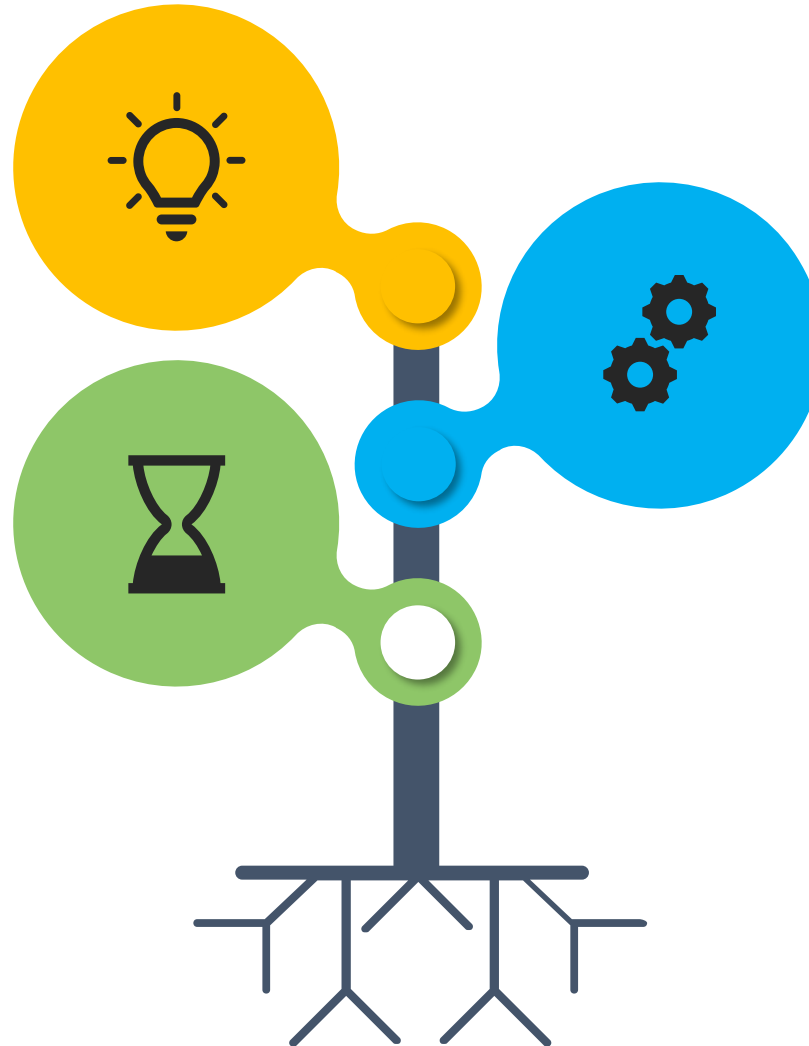
- Aug. 3, 2009 – IPB, UPLB applied for multi - location field trial to BPI
- Mar. 15, 2010 – BPI approved the MLT in 7 sites
- Safety assessment studies conducted:
 - Bioefficacy study and horticultural performance
 - Environmental safety studies:
 - - Effect on non -target organisms
 - - Comparative responses of Bt eggplant and its non -Bt counterpart to common pests and diseases
 - - Genetic stability of the Bt trait
 - - Survey of wild relatives of eggplant and their capacity to hybridize with eggplant



Conditions to prevent pollen flow/seed dissemination

Observe the 200m physical isolation from all eggplant field outside the enclosed experimental area at all times

Strictly implement monitoring/inspection of the surrounding 200m radius isolation to ensure that no wild relatives are present within the isolation distance



Ensure that the whole field trial area be provided with pollen trap plants (4 rows of non-Bt eggplant)

Conditions to prevent persistence in the environment

Remove fruits before they ripen, fruits that retained for seeds shall be bagged

All viable plant materials shall be destroyed

All Bt and non-Bt eggplant shall be collected, chopped and buried within the site



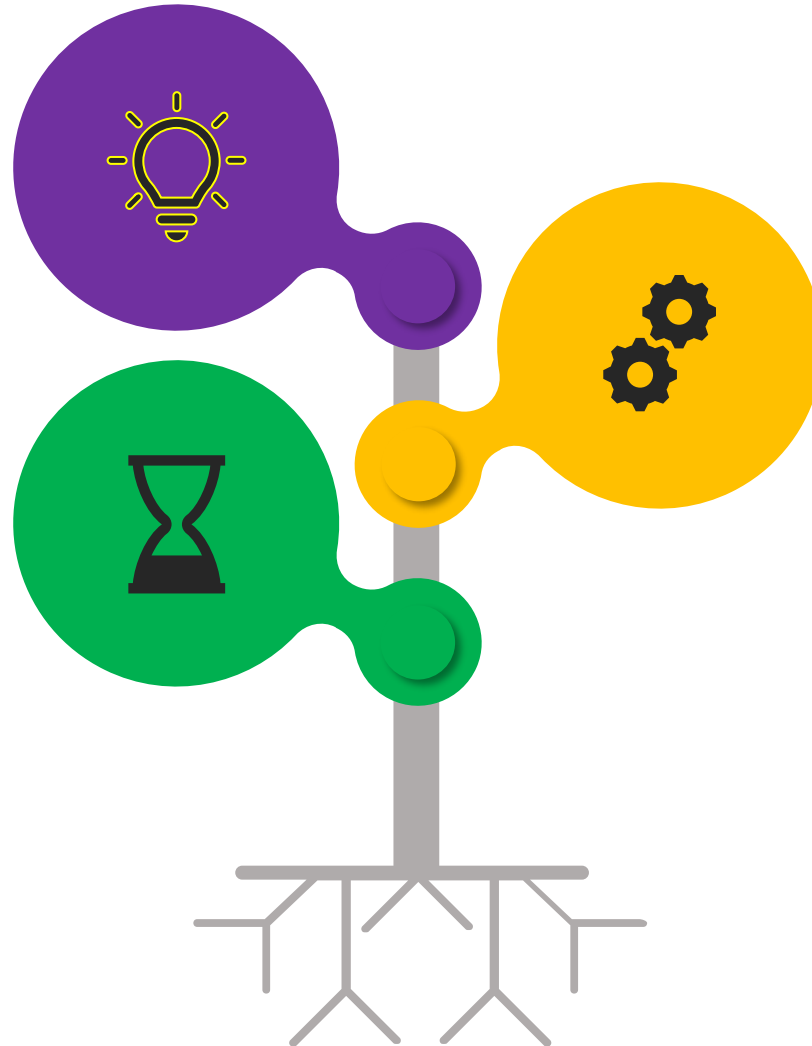
The site will not be used for a minimum of 60 days after completion of the field trial

The site must be left undisturbed and volunteer plants monitored

Conditions to prevent introduction into the food/feed pathways

Movement and storage of Bt eggplant seeds and viable plant materials are controlled

Ensure that stray animals are excluded from the trial site



Ensure that only authorized persons are allowed inside the trial sites



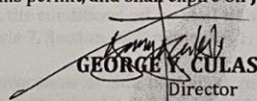
Republic of the Philippines
Department of Agriculture
BUREAU OF PLANT INDUSTRY
692 San Andres St., Malate, Manila

**Biosafety Permit for Direct Use as Food and Feed,
or for Processing
Number 21-078FFP**

EE-1 Eggplant owned and licensed by University of the Philippines Los Baños., with office address at UPLB Campus, College Laguna, has undergone satisfactory biosafety assessment pursuant to the DOST-DA-DENR-DOH-DILG Joint Department Circular No. 1, Series of 2016 and found to be as safe as conventional eggplant and can be a substitute for its traditional counterpart as food and feed, or for processing. Further, the permittee has satisfactorily complied with all requirements for the issuance of biosafety permit for direct use as food and feed, or for processing.

The permittee shall take appropriate measures to prevent accidental and unintentional release/reproduction and its recurrence and thereby protect human and animal health, and the environment. A Plant Quarantine Officer and his/her duly authorized representatives shall be allowed access during regular business hours to the facility where the regulated article is located and to any records relating to the importation of the regulated article.

Issued on **July 21, 2021** at the Bureau of Plant Industry, San Andres St., Malate, Manila subject to conditions stated at the back of this permit, and shall expire on **July 20, 2026**.


GEORGE Y. CULASTE, Ph.D.
Director
Bureau of Plant Industry

Direct Use Food, Feed or Processing



THE UP LEAGUE OF AGRICULTURAL BIOTECHNOLOGY STUDENTS

BT EGGPLANT

NOW APPROVED FOR FOOD FEED AND PROCESSING

On July 23, 2021, the Philippine Department of Agriculture-Bureau of Plant Industry has approved Bt eggplant event 'EE-1' for direct use as food, feed, or for processing (FFP) and issued Biosafety Permit No. 21-078FFP to the University of the Philippines Los Baños.

To complete the biosafety regulatory process, Bt eggplant will need commercial propagation approval for environmental safety assessment before it can be made available to the public.

The commercialization of Bt eggplant will increase marketable yield by 192% and reduce pesticide application per hectare by 48%.

FROM THE INTERNATIONAL SERVICE FOR THE ACQUISITION OF AGRI-BIOTECH APPLICATIONS (ISAAA)

EXECUTIVE SUMMARY

On August 24, 2020, UPLB submitted EE-1 eggplant for direct use, as original application under the DOST-DA-DENR-DOH-DILG Joint Department Circular (JDC) No. 1 Series of 2016.

After reviewing the Risk Assessment Report and attachments submitted by the applicant, the Scientific and Technical Review Panel (STRP), Bureau of Animal Industry, and BPI Plant Products Safety Services Division concurred that EE-1 eggplant is as safe as its conventional counterpart.

The Department of Health – Biosafety Committee (DOH-BC), after a thorough scientific review and evaluation of documents related to Environmental Health Impact, concluded that EE-1 eggplant is safe as its conventional counterpart and shall not pose any significant risk to human health.

The Department of Environment and Natural Resources Biosafety Committee (DENR-BC) considered that EE-1 eggplant poses no significant adverse effect to the environment.

Furthermore, the Socio-economic, Ethical and Cultural (SEC) Considerations expert also recommended for the issuance of biosafety permit for this regulated article after assessing the socio-economic, social and ethical indicators for the adoption of Genetically Modified Organisms.

Background

In accordance with Article VII, Section 20 of the JDC, no regulated article, whether imported or developed domestically, shall be permitted for direct use as food and feed, or for processing, unless: (1) the Biosafety Permit for Direct Use has been issued by the BPI; (2) in the case of imported regulated article, the regulated article has been authorized for commercial distribution as food and feed in the country of origin; and (3) regardless of the intended use, the regulated article does not pose greater risks to biodiversity, human and animal health than its conventional counterpart.

The BPI Biotech Office provided the assessors the complete dossier submitted by UPLB.

Commercial propagation

Application for Commercial Propagation & Registration of Bt Eggplant 'Event EE-1' as Plant-Incorporated Protectant (PIP) to the Fertilizer and Pesticide Authority (FPA)

along already available in the Philippines?

Bt eggplant is not yet commercially available in the Philippines. Field trials were completed in 2012.



The next stage in the regulatory process is the applications to the Bureau of Plant Industry for food, feed and processing and commercial propagation and the registration of the plant-incorporated protectant (PIP) with the Fertilizer and Pesticide Authority.

Parting words...

“Scientific and regulatory agencies around the world have repeatedly and consistently found crops and foods improved through biotechnology to be as safe as, if not safer than, those derived from any other method of production. ... Opposition based on emotion and dogma contradicted by data must be stopped”

Laureates Letter Supporting Precision Agriculture (GMOs)

SAFE.



No substantiated evidence of a difference in risks to human health between current commercially available genetically engineered [GMO] crops and conventionally bred crops.

The National Academies of
SCIENCES • ENGINEERING • MEDICINE

Thank You!



BT Tal
appro
Use

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Department of Agriculture -
Bureau of Plant Industry (DA-BPI) has
granted the biosafety permit for
commercial propagation of Golden
Rice to the DA - Philippine Rice
Research Institute on 22 July 2021.

Golden Rice

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