

Comments to the EFSA public hearing of genetically modified oilseed rape GT73 (EFSA-GMO-RX-002)

D. 12.02 Case-specific GM plant monitoring

Given the scope of the application, accidental spillage and loss of viable seeds of GT73 during transport, storage, handling, and processing into derived products cannot be precluded. Oilseed rape can establish feral populations outside cultivated areas (e.g. roadsides, railway ground, ports) and escaped populations of herbicide-tolerant oilseed rape have been reported along transportation routes, ports and close to processing plants in Japan, Canada and USA (Yoshimura et al., 2006; Knispel et al., 2008; Nishizawa et al., 2009, 2016; Schafer et al., 2011). Feral transgenic oilseed rape is also detected along railway lines in Switzerland (Hecht et al., 2014) and near oil mills in Germany (Franzaring et al., 2016).

Germination and establishment of volunteer GT73 plants may result in gene flow into cultivated and feral *Brassica napus* as well as into closely related wild relatives (Knispel et al., 2008; Schafer et al., 2011). In Norway glyphosate may be used for weed control in non-agricultural environments including traffic areas, and therefore spilled GT73 might have a selective advantage over conventional oilseed rape along some transport routes.

The magnitude of establishment, dissemination and gene flow depends among others on the level of GT73 oilseed rape in the imported oilseed rape commodities. Therefore, case-specific monitoring has to focus on pathways where viable GT73 oilseed rape enters into the environment.

The applicant is requested to provide an appropriate case-specific monitoring plan, comprising: i) spillage or loss of GT73 oilseed rape during transport, storage, packaging, processing and use, ii) spread and persistence of GT73 oilseed rape, if spillage or loss of viable GT73 oilseed rape occurs, iii) out-crossing of GT73 oilseed rape to cultivated and feral/naturalized oilseed rape populations and wild relatives resulting from spillage or loss of viable GT73 oilseed rape.

References

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