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First name: Helen

Last name: Wallace

Organization:

Title:

Comments: GeneWatch UK is a not-for-profit organisation which aims to ensure that genetic technologies are used in the public interest. Our comment is on the proposed policy on genetically modified (GM) trees (paragraph 10 in Section 2475.03 - Policy, page 47).

We would like to draw the USDA Forest Service's attention to our 2023 report "GM Trees: Can We, Should We?", attached and available online at: <https://www.genewatch.org/uploads/f03c6d66a9b354535738483c1c3d49e4/gm-trees-fin2.pdf>

The extensive evidence in this report supports its conclusions, which include:

"Modifying wild ecosystems raises fundamental risks and uncertainties that cannot be adequately assessed with current GMO risk assessment processes. Current GM assessments omit analysis of forest health and potential long-term impacts on the full range of parameters that are relevant to tree releases, including impacts on soil, species-interactions, water systems, gene flow, nutrient uptake, disease resilience, stress resilience, communication networks, and evolutionary processes. But more crucially, it remains highly questionable whether any risk assessment can ever be sufficiently robust to ensure against harms, given current human understanding and lack of knowledge about trees and forest environments."

Finally, the report concludes:

"Given the lifespan of trees, any GM releases could have impacts that manifest over centuries and even millennia. Although humanity can release GM trees, it remains extremely questionable whether we will ever be confident of the long-term impacts. As raised by a US EPA official in reference to the GM Chestnut, "Just because we can do something, should we?"".

Attachment: GM Trees. Can We? Should We? A report by GenewatchUK