

Data Submitted (UTC 11): 10/14/2024 4:00:00 AM

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Comments: Please see our attached files and comments. The Florida Keys Environmental Coalition is the face of the opposition for the release of Genetically Modified Mosquitoes. Our experience in this field is scientific with great success at recognizing the weaknesses of the technology and in our case the unethical and unscientific behavior of the engineering company. Our comments here are not specific on the genetic modification, but it is clear there are significant negative outcomes that have been shown in this germ-line edits. There is no retrieval of the species once released. The concept of zero mitigation and no self limitation are in fact concerning technical design and program planning attributes.

We highly advise against proceeding in this manner. There is not an abundance of urgency at this point regarding the American Chestnut and getting things right and having control are much more important than the haste we perceive from the optimism expressed by the US Forest Service (USFS). The D54 and D58 Genetically Engineered species have a chorus of strong scientific objections and we support those positions and urge the USFS to discontinue use and investigation into those variants.

FKEC.org has been the face of our community and in large part, globally, in a scientific battle to assure safety in a for profit company quest to release genetically modified mosquitoes (GMMs). The signs were clear that the technology was not only questionable in terms of performance, but the company who made the GMMs either didn't understand their own technology, or they felt it was better to just deny and play stupid. The reality is that they used any means possible, including political, breaking with responsible scientific practice, to achieve permission to run an experiment on our community without ever proving some very critical and highly likely threats to health safety for humans and the ecosystem.

Genetically Engineered Trees. (GETs) has shown clear performance concerns and given these suggest a lack of understanding by the science behind the GE process, this further reinforces that fact that GE is a nascent science, but like any technology, there are many and for many reasons, who wish to move into dangerous areas of testing and release. Given there are already signs of failure, and evolutionary and off target mutational effects that have yet to emerge, wild release means loss of control.

We must all protect our ecosystems and humanity from bad science. Bad science defined as science that takes unnecessary risks. Restoring the American Chestnut is a desire and a laudable goal, but doing so requires we do not create other issues by taking a zealous approach. These types of mistakes defy mitigation and spreading GET throughout the wild population would surely end the American Chestnut as a pure species. Isn't that in itself contrary to the goal?

Our knowledge of the genome of species has a long way to go before releasing germ-line edited species is done in complete safety and without unforeseen repercussions. There are many experts in this field, many lead programs at some of our most respected universities in GE, who object on record to this unscientific zeal (J Kuzma, F Gould, N Kofler, H Tuten, etc.). The precautionary principle needs to be the standard and that is to "prove it is safe", not to prove it is good enough because someone has a pride, profit, or other motivation to diverge from the precautionary principle.

Please do not pollute our world with bad science and for profit disasters.