

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

First name: Anne

Last name: Petermann

Organization: Global Justice Ecology Project / The Campaign to STOP GE Trees

Title: Executive Director

Comments: Global Justice Ecology Project and the Campaign to STOP GE Trees is submitting these comments on behalf of themselves and 318 signatories (see attached for list of signatories).

The US Forest Service has long been regarded by those involved in the protection of US forests as a threat to those forests. Now the agency proposes adding genetically engineered trees to the history of clear cut logging, spraying of toxic herbicides, road building and other mismanagement of our public lands.

The specific mention of the GE American chestnut by the Forest Service as a reason to open public lands to GE trees demonstrates either a callous disregard for forest health or a fundamental lack of understanding of the threats it poses. The Darling 54/58 GE American chestnut, proposed for USDA deregulation, was a dismal failure. The GE trees were defective. If released into forests, they would likely contaminate many of the millions of remaining wild American chestnuts with this defect, dooming their recovery.

A longtime proponent of this GE American chestnut, the American Chestnut Foundation, has strongly denounced the D54/58 GE chestnut stating that its genetic defect makes it unsuitable for restoration purposes, and opposes its deregulation by the USDA:

"Throughout 2023, TACF and its partners observed disappointing performance results from broad-scale field and greenhouse tests of advanced generations of Darling trees across several geographic locations. [Our] analysis indicated striking variability in Darling trees' blight tolerance, significant losses in growth competitiveness, reduction in overall fitness including stunted growth, leaf browning and curling, and increased mortality. View an outline of the body of evidence concerning Darling's performance issues on the Darling 58 Performance page (<https://taf.org/darling-58-performance/>).

"In Darling 54, the OxO gene has been inserted into a coding region, causing a deletion of 1,069 base pairs in a salinity tolerance gene called SAL1. ...

"The fact that the 35S OxO construct in D54 interrupts a known gene, and has caused a large deletion of that gene, combined with the disappointing performance of the D54 trees in the field and the observed lethal homozygosity, have led TACF to conclude that this product should not be distributed or propagated beyond permitted sites. TACF believes these genetic issues should not be proliferated into current or future restoration or commercial chestnut populations.

The GE American chestnut is a concrete example of the unpredictable risks of GE trees.

Restoration of the American chestnut is being accomplished in spite of the attempts to genetically engineer it. Blight resistant 100% wild American chestnuts are already being grown and distributed.

GE trees pose unprecedented, irreversible and unnecessary threats to forests, the Forest Service must ban them from public forests.

Attached are 318 signatories of these comments, who in some cases also included their own comments (see attached). They represent people and organizations from:

Australia

Belgium

Brazil

Canada

Chile

Croatia

France

Germany

India

Japan

Mexico

Mozambique

Netherlands

New Zealand

Norway

Poland

Portugal

Slovenia

Tanzania

United Arab Emirates

United Kingdom

United States

Venezuela

ATTACHMENT: Excel list of signatories