

Alliance Against Conflict of Interest (AACI)

March 7, 2025

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To,
The Secretary,
Ministry of Environment, Forest and Climate Change,
Indira Paryavaran Bhawan,
Jor Bagh road,
New Delhi - 110003
Email: secy-moef@nic.in

Sub: Objections and Suggestions, related to the Ministry of Environment, Forest, and Climate Change's Gazette Notification dated 31st December, 2024, related to conflict of interest on GM regulation Document no: CG-DL-E-02012025-259846

Dear Sir,

I am writing to formally submit my objections and suggestions regarding the Ministry of Environment, Forest, and Climate Change's Gazette Notification dated **31st December 2024**, concerning conflict of interest in GM regulation.

The gazette notification has numerous areas of weakness and needs improvement on these.

1. It must be ensured that those who hold conflict of interest must not be brought in regulatory position altogether. The draft does not make any reference to the same.
2. Those having conflict of interest must include those who are (either currently on it past) GM crop developers/promoters, funded GM crops (whether in India or abroad), been involved with companies who have worked on promoting GM crops. The current draft does not make any reference to the same. The Department of Biotechnology (a GM promoting organisation) and its various bodies must also be similarly excluded from being on such regulatory committees. Those ICAR scientists who have been GM crop developers must similarly be excluded from the Committee. On the other hand ecologists, entomologists, public health experts must also be added to the regulatory committee.
3. Declaration of funding – those who are asked to join as GM regulators, must be asked to declare their funding sources for research work, sponsored travel public to mitigate conflict of interest. Such declarations must also be done on a 6-monthly basis to mitigate any future conflict of interests too. Such declarations must be made public.
4. To prevent revolving doors, people on various committees must be asked to give written undertakings of not joining any GM crop

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development/promoting agency (whether public or private) for a period of 5 years.

5. Bio- data of experts on Committees to be put on public websites.

Hon. Supreme Court's verdict in the GM Crops: "Union of India must ensure that all credentials and past records of any expert who participates in the decision-making process should be scrupulously verified and conflict of interest, if any, should be declared and suitably mitigated by ensuring representation to a wide range of interests. Rules in this regard may be formulated having a statutory force."

We request you to implement the Conflict of Interest ask from the Supreme Court in letter and spirit for GM crops to help ensure that we have a strong regulatory body.

With thanks,

On behalf of



Dr. Arun Gupta
Convener

Alliance Against Conflict of Interest, Members (AACI)