



## ADVISORY COMMITTEE ON RELEASES TO THE ENVIRONMENT

### *Advice on a notification for marketing of a GM potato modified for starch composition*

<b>Notifier:</b>	BASF Plant Science
<b>Notification reference:</b>	C/SE/96/3501
<b>Product:</b>	Potato clone EH92-527-1 genetically modified to enhance the content of the amylopectin component of starch.
<b>Scope:</b>	Cultivation of potato clone EH92-527-1 and use for the extraction of starch for industrial uses, and the use of the by-products of starch extraction in animal feed.
<b>Date:</b>	28 May 2004

**Advice of the Advisory Committee on Releases to the Environment (ACRE) under S.124 of the Environmental Protection Act 1990 (Part VI) to the Secretary of State for Environment, Food and Rural Affairs, Scottish Ministers, Ministers of the Welsh Assembly Government and the Department of Environment (Northern Ireland).**

**Primary advice:** ACRE has considered this notification for marketing of potato clone EH92-527-1, modified for the production of high amylopectin starch. On the basis of the information provided, the Committee concludes that cultivation and use of potato clone EH92-527-1 poses no additional risks to human health and environment compared to the parental potato cultivar. However, in order to complete the risk assessment further information is required concerning:

1. The presence of potential novel open reading frames or disruption of existing open reading frames in the potato genomic sequence adjacent to the insert site.
2. The effect of feeding the pulp of potato clone EH92-527-1 to rats in a 90 day toxicological study.

### **Comment**

#### **Molecular characterisation**

ACRE considered that the molecular characterisation of potato clone EH92-527-1 presented by the notifier was generally of a high standard, well presented and fit for purpose. The Committee concluded that sufficient evidence had been provided to confirm that the insert is present as a single copy, and that only sequences contained within the T-DNA borders of the transformation vector are inserted within the potato genome.

The Committee noted that a detailed analysis of potential novel open reading frames (ORFs) contained within the inserted sequences has been carried out, in particular focussing on the ORF termed ORF4 by the notifier. This sequence contains homology to the bleomycin (*ble*) resistance protein of Tn5 (50 amino acids of the 126 found in the full length *ble* gene) together with a section of the ornithine cyclodeaminase gene of *Agrobacterium*. The Committee concluded that sufficient evidence has been provided to show that, while this novel ORF is expressed at the RNA level, novel protein is not produced in potato leaves or tubers. Further, the Committee concluded, on the basis of the notifier's studies on expression in *E. coli*, that the ORF4 gene does not encode a functional bleomycin resistance protein.

The Committee considered the notifier's analysis of homology of the ORF4 sequence with known allergens. This analysis had been carried out in the year 2000, and a repeat of these homology searches revealed additional homologies not reported in the notification. In particular, there is a 4 amino acid homology within the ornithine cyclodeaminase gene to a mite allergen. However, the Committee concluded that the presence of this homology did not pose a risk for the following reasons. First, this is a very short stretch of homology, which is unlikely to result in an allergenic protein. Secondly, this stretch of homology is found in an extant gene from *Agrobacterium*, which is already widespread in the environment. Thirdly, there is no evidence that protein with an amino acid sequence derived from ORF4 is present in potato clone EH92-527-1, at least in the tissues where this has been examined. The Committee notes that an investigation of the presence of ORF4 protein in pollen has not been carried out, but concludes that it is unlikely that the protein would be produced, and even if the protein were expressed in pollen this does not represent a significant route of exposure because of the extremely low rates of pollen production in potato. However, the Committee considered that the notifier should carry out case-specific monitoring to examine whether the ORF4 protein is present in the pollen of clone EH92-527-1.

While a detailed analysis of the ORFs present in the inserted DNA has been carried out, the notification does not consider the possibility of the generation of novel ORFs or the disruption of existing ORFs in the potato genomic sequence on either side of the insert site. While the Committee accepts that the detailed phenotypic characterisations presented in the notification make unexpected changes in gene expression unlikely, in order to complete the risk assessment of potato clone EH92-527-1 this information is required.

### **Animal feed safety**

The GM subgroup of the Advisory Committee on Animal Feedingstuffs (ACAF) has concluded that, on the basis of the data provided, there is no reason to consider that feeding the by-products of starch extraction from potato clone EH92-527-1 to animals poses any additional risks to animal health compared to the parental cultivar. This conclusion is based on the thorough compositional analysis of the tubers of potato clone EH92-527-1, together with the results from a ruminant feeding study. However, the ACAF GM subgroup considered that further analysis to confirm the absence of potential unintended effects was required before their assessment could be completed. While the ACAF GM subgroup notes the arguments presented by the notifier concerning the difficulties of feeding laboratory animals raw potato material, the subgroup considers that a comparative feeding study made with rats using potato pulp derived from EH92-527-1 and from the parental cultivar is appropriate. Completion of a study in which pulp is included to the maximum level permitted by nutritional requirements and at an intermediate level would provide a basis for concluding on the absence of any unintended effects.

ACRE agree with the assessment of the ACAF GM subgroup, and noted that the scope of the present application would not permit feeding of intact tubers from potato clone EH92-527-1 directly to animals as an alternative to processing for starch extraction.

### **Environmental risk assessment**

ACRE considered the environmental risk assessment provided by the notifier to be thorough and agreed with its conclusions. The Committee noted the presence of the *nptII* antibiotic resistance marker gene (conferring resistance to the antibiotics kanamycin and neomycin) in potato clone EH92-527-1, but did not consider that this posed a significant risk. The *nptII* gene is widespread in bacterial populations so that its presence in a GM crop does not significantly enhance the spread of resistance to kanamycin and neomycin in bacteria. These antibiotics are not in widespread clinical or veterinary use.

The Committee noted that a strict identity preservation regime is proposed for potato clone EH92-527-1. While this regime is fit for purpose, the Committee considered that the proposed one-year potato free period following cultivation of potato clone EH92-527-1 was insufficient to guarantee the absence of volunteers of potato clone EH92-527-1 from subsequent potato crops. The Committee did not consider that the presence of potato clone EH92-527-1 in food or feed posed a risk to human or animal health, but recommended that the notifier reminds growers of their obligations to ensure that GMOs that are not authorised for human food use do not enter the food chain. This may require volunteer control measures in addition to those recommended for identity preservation purposes.

### **Post market monitoring**

ACRE welcomed the detailed proposals for case-specific monitoring provided by the notifier. In addition to the proposed case-specific monitoring, the Committee also recommends that monitoring for the presence of the ORF4 protein in pollen is carried out (see above).

Concerning the general surveillance plan, the Committee was broadly content with the proposed approach. However, the Committee considered that additional detailed plans for general surveillance should be provided by the notifier to the satisfaction of the Swedish authorities prior to any commercial cultivation of potato clone EH92-527-1.

The Committee also noted the notifier's proposal to review the post-market monitoring plan after 5 years, with a view to extending or simplifying monitoring activities in the light of results obtained. The Committee considered that this was an appropriate approach to monitoring, which would allow the monitoring plan to be optimised in the light of experience.