

13. Risk Assessment (Annex III of the Cartagena Protocol on Biosafety)

COMMON FORMAT FOR Risk Assessment

(In accordance with Annex III of the Cartagena Protocol on Biosafety)

Risk assessment details	
1. Country Taking Decision:	South Africa
2. Title:	Application for Commodity Clearance of Genetically Modified Organisms (GMO) - MON 87427 × MON 89034 × MON 88017
3. Contact details:	Monsanto Company, represented by Monsanto S.A.(Pty) Ltd Monsanto Company 800 N. Lindbergh Boulevard St. Louis, Missouri 63167 U.S.A Monsanto House, Building No. 4 Fourways Office Park Maizeer Fourways Boulevard and Roos Streets Fourways South Africa
LMO information	
4. Name and identity of the living modified organism:	Multi-event stack MON 87427 × MON 89034 × MON 88017
5. Unique identification of the living modified organism:	MON-87427-7× MON-89034-3 × MON-88017-3
6. Transformation event:	MON 87427 × MON 89034 × MON 88017
7. Introduced or Modified Traits:	Chemical tolerance - Herbicide tolerance Pest resistance - Insect resistance
8. Techniques used for modification:	MON 87427 × MON 89034 × MON 88017 maize was obtained by conventional breeding of three single maize products: MON 87427, MON 89034 and MON 88017. MON 87427, MON 89034 and MON 88017 have been developed by Monsanto Company.
9. Description of gene modification:	MON 87427 × MON 89034 × MON 88017, expresses the CP4 EPSPS protein which confers tolerance to glyphosate, the Cry1A.105 and Cry2Ab2 insecticidal proteins, providing tolerance to <i>inter alia</i> maize stalk borers in South Africa, the Cry3Bb1 insecticidal protein that provides protection against certain coleopteran insect pests belonging to the Chrysomelidae family (corn rootworm, <i>Diabrotica</i> spp.) and the CP4 5-enolpyruvyl shikimate-3-phosphate synthase (CP4 EPSPS) protein that confers tolerance to glyphosate.

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	Characteristics of modification
10. Vector characteristics (Annex III.9(c)):	Not applicable, MON 87427 × MON 89034 × MON 88017 was obtained through conventional breeding methods.
11. Insert or inserts (Annex III.9(d)):	- Like MON 87427, MON 87427 × MON 89034 × MON 88017, expresses the CP4 EPSPS protein which confers tolerance to glyphosate, the active ingredient in the Roundup® family of agricultural herbicides. The specific promoter and intron combination (<i>e35S-hsp70</i>) is utilized to drive CP4 EPSPS protein expression in vegetative and female reproductive tissues, conferring tolerance to glyphosate in the leaves, stalk, root and tissues that develop into seed or grain and silks. This specific promoter and intron combination also results in limited or no production in key male reproductive tissues, thus the male tissues are not tolerant to glyphosate. This allows MON 87427 containing inbred lines to serve as the female parent in the efficient production of hybrid seed - Like MON 89034, MON 87427 × MON 89034 × MON 88017 expresses the Cry1A.105 and Cry2Ab2 insecticidal proteins, providing tolerance to <i>inter alia</i> maize stalk borers in South Africa. - Like MON 88017, MON 87427 × MON 89034 × MON 88017 expresses the Cry3Bb1 insecticidal protein that provides protection against certain coleopteran insect pests belonging to the Chrysomelidae family (corn rootworm, <i>Diabrotica</i> spp.) and the CP4 5-enolpyruvyl shikimate-3-phosphate synthase (CP4 EPSPS) protein that confers tolerance to glyphosate.
Recipient organism or parental organisms (Annex III.9(a)):	
12. Taxonomic name/status of recipient organism or parental organisms:	Common name: Maize Family name: Gramineae Genus: Zea Species: mays (2n+20)
13. Common name of recipient organism or parental organisms:	Maize or Corn
14. Point of collection or acquisition of recipient or parental organisms:	MON 87427 × MON 89034 × MON 88017 was produced using elite parent lines into which the MON 87427, MON 89034, and MON 88017 events have been introgressed independently, using conventional breeding techniques. The original transformations that produced the individual events used privately owned germplasm acquired for this purpose.

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15. Characteristics of recipient organism or parental organisms related to biosafety:

Maize is the world's third leading cereal, following rice and wheat, in terms of production and area harvested. It has a long history of safe use as a raw material for processed products, and direct uses as a human food or animal feed. Today, maize is produced on every continent except Antarctica, and is exported and imported as viable grain for use as foods or feeds, or directly in processing, without risk to the environment.

According to the OECD [Consensus Document on the Biology of *Zea mays* subsp. *mays* (Maize), 2003], "*Maize has lost the ability to survive in the wild due to its long process of domestication, and needs human intervention to disseminate its seed*". In addition, "*maize is incapable of sustained reproduction outside of domestic cultivation*", and "*maize plants are non-invasive in natural habitats*." Despite the fact that maize frequently appears as a volunteer plant in a subsequent rotation, it has no inherent ability to persist or propagate. In all regions of the world, volunteer plants are managed with herbicides, tillage, or manual removal of plants. As such, maize is not considered to be a pest anywhere in the world. When it occurs outside of cultivation, it has no impact on the conservation and sustainable use of biological diversity.

Gene flow from maize occurs through dispersal of seed and pollen-mediated exchange of genes to sexually compatible plants. Since maize has no biological mechanism to scatter seed, low-level, incidental dispersal of viable grain occurs as a result of human-based activities such as transport and harvesting operations. As was noted by the OECD, the few plants that might result from incidental release will not persist or meaningfully reproduce without human intervention. Gene flow via pollen is only possible to other maize plants throughout the world except in Mexico and Guatemala where wild relatives occur. Maize reproduces sexually, is a wind-pollinated, monoecious species with separate staminate (tassels) and pistillate (silk) flowers, which encourages natural cross-pollination between maize plants. The distance that viable pollen can travel depends on prevailing wind patterns, humidity, and temperature. Generally, the pollen dissemination period lasts three to seven days. Because incidental release of maize during importation occurs at very low levels, and because maize is not competitive, pollen-mediated gene flow between local maize and rare volunteers has had no effect on the conservation and sustainable use of biological diversity.

16. Centre(s) of origin of recipient organism or parental organisms:	Maize is thought to have its origin in Mexico, from where it spread northward to Canada and southward to Argentina. Although secondary centres of origin in South America are possible, the oldest archaeological evidence of domesticated maize (5000 B.C.) was discovered in the valley of Tehuacan in Mexico (Benson and Pearce, 1987). Several theories on the origin of maize have been proposed; the two theories most adhered to being that either teosinte (a wild relative of maize that is endemic to parts of Mexico and Guatemala) or a wild pod maize that is now extinct was the wild ancestor of maize (Benson and Pearce, 1987; Brown <i>et al.</i>, 1984). Maize is a member of the genus <i>Zea</i>, which is broken into 2 sections: ZEA and LUXURIANTES. The section ZEA includes one species (<i>mays</i>), which includes three subspecies: <i>ssp. mays</i>, <i>ssp. mexicana</i> (formerly <i>Euchlaena mexicana</i>), and <i>ssp. parviglumis</i>. The former subspecies is known as maize while the latter comprise a portion of the complex known as teosinte. Furthermore, <i>ssp. mexicana</i> and <i>ssp. parviglumis</i> are further separated into several races (OECD, 2003). Section LUXURIANTES encompasses 3 species: an annual <i>Z. luxurians</i>, and perennials <i>Z. diploperennis</i> and <i>Z. perennis</i>. While the classification of <i>Zea</i> continues to be modified, teosintes are the only know wild relatives of maize capable of forming hybrids in nature. Outcrossing and gene exchange between teosinte and maize has been reported with annual teosinte (<i>Zea mays</i> <i>ssp. mexicana</i>) (2n = 20) and maize (<i>Zea mays</i> L.) (2n = 20). A frequency of one F1 hybrid (maize × teosinte) for every 500 maize plants or 20 to 50 teosinte plants in the Chalco region of the Valley of Mexico was reported. However, newer information shows that annual teosintes may be a separate species because of the level of genetic isolation and that hybrids that do form are highly unsuccessful in introgressing genetic material (OECD, 2003). Regardless, Mexico and parts of Central America are regarded as the center of genetic diversity for maize. The natural distribution of teosinte is limited to the seasonally dry, suropical zone with summer rain along the western escarpment of Mexico and Guatemala and the Central Plateau of Mexico. The belief that Central America and southern Mexico are both the center of origin and a center of diversity for maize was supported by Vavilov (1992).
17. Centres of genetic diversity, if known, of recipient organism or parental organisms:	Refer to 16 above

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| 18. Habitats where the recipient organism or parental organisms may persist or proliferate: | <p>As noted by OECD (2003), maize is not invasive of natural habitats, does not persist or disperse anywhere in the world without the human intervention. Early domestication and diversification through selection occurred in Meso-America. Maize is grown across a wide range of ecological conditions including soil types, altitude and rainfall. Currently, maize is grown over a wide range of conditions because of its many divergent types that have been bred for this purpose. The bulk of the maize is produced between latitudes 30° and 55°, with relatively little grown at latitudes higher than 47° latitude anywhere in the world. The greatest maize production occurs where the warmest month isotherms range between 21°C and 27°C and the frost-free season lasts 120 to 180 days. A summer rainfall of 15 cm is approximately the lower limit for maize production without irrigation.</p> <p>Experience with maize imported for use as foods or feeds, or directly in processing, has demonstrated that stable populations do not establish, persist or proliferate as a result of this practice.</p> |
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Donor organism or organisms (Annex III.9(b)):

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| 19. Taxonomic name/status of donor organism(s) | <p>MON 87427 × MON 89034 × MON 88017 was obtained from conventional breeding of the single events MON 87427, MON 89034 and MON 88017.</p> <p>The donor organisms used in development of the single events MON 87427, MON 89034 and MON 88017 were <i>Bacillus thuringiensis</i> and <i>Agrobacterium tumefaciens</i> strain CP4.</p> |
| 20. Common name of donor organism(s): | Bacteria |
| 21. Point of collection or acquisition of donor organism(s): | The organisms are ubiquitous in nature |
| 22. Characteristics of donor organism(s) related to biosafety: | Not applicable, since the donor organisms are ubiquitous in nature and therefore do not pose a threat to biodiversity. |

Intended use and receiving environment

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| 23. Intended use of the LMO (Annex III 9(g)): | The intent of this application is for the commodity import of maize containing MON 87427 × MON 89034 × MON 88017 |
| 24. Receiving environment (Annex III.9(h)): | The receiving environments are varied and represent the maize producing area in South Africa. There are no reported and scientifically documented cases of any impact on biodiversity or animal and human safety concerns. |

Risk assessment summary

25. Detection/Identification method of the LMO (Annex III.9(f)):	MON 87227 × MON 89034 × MON 88017 was produced by crossing plants containing MON 87427, MON 89034 and MON 88017, using conventional breeding methods. Therefore, MON 87427 × MON 89034 × MON 88017 is detectable using the combination of the single event-specific PCR method for detecting the introduced DNA present in the single events MON 87427, MON 89034 and MON 88017. For all plants in which two or more events are combined by conventional breeding, the events involved will segregate in the grain; therefore such detection methods when applied to individual grains harvested from fields of MON 87427 × MON 89034 × MON 88017 will detect any combination of the three events. Event specific detection methods for detection of MON 87427, MON 89034 and MON88017 DNA have been validated by the European Commission Joint Research Centre (EU JRC) and are available on the EU JRC website
26. Evaluation of the likelihood of adverse effects (Annex III.8(b)):	Based on the nature of the recipient species (unable to proliferate) and the lack of related and wild species with which MON 87427 × MON 89034 × MON 88017 can outcross, the likelihood of adverse effects from out-crossing to other related species is negligible. Transgenic maize hybrids with similar genes have been grown around the world for several years and in South Africa for 17 years without any recorded impact on the environment other than those created by conventional maize production. Any volunteers could, like conventional maize, be removed by current agricultural practices such as ploughing and the use of herbicides.
27. Evaluation of the consequences (Annex III.8(c)):	Studies conducted with MON 87427 × MON 89034 × MON 88017 confirmed that this event is agronomically and compositionally equivalent to conventional maize and has no increased tendency towards weediness or an increased susceptibility of tolerance to insects normally associated with maize. Thus, should any of the potential risks materialize, the consequences would be negligible. No potentially adverse effects were detected based on extensive characterization of MON 87427 × MON 89034 × MON 88017, which included molecular analysis, expression analysis, compositional analyses and phenotypic evaluation. Testing of MON 87427 × MON 89034 × MON 88017 demonstrated no changes in its ability to persist in the environment without human intervention or to become invasive compared to conventional maize. As such, the potential consequences to biodiversity resulting from MON 87427 × MON 89034 × MON 88017 for commercial use, including food, feed or processing, are the same as with conventional maize. Any volunteer seed germinating in subsequent growing seasons would be detected in the fields that were planted and destroyed using chemical or mechanical means.

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28. Overall risk (Annex III.8(d)):	Considering the potential risks and the consequences should the potential risks materialize the overall risk of importing, cultivating or field testing MON 87427 × MON 89034 × MON 88017 is extremely low.
29. Recommendation (Annex III.8(e)):	No risks have been identified and therefore other than the containment parameters that might apply through the permit conditions, no additional actions need to be taken.
30. Actions to address uncertainty regarding the level of risk (Annex III.8(f)):	The potential risks for the specific product is negligible; hence no additional actions are required except compliance with the conditions contained in the permit.
Additional information	
31. Availability of detailed risk assessment information:	More information regarding the safety of MON 87427 × MON 89034 × MON 88017 is contained in the application preceding this section. Additional information can be obtained from the individual event dossiers submitted for MON 87427, MON 89034 and MON 88017, as well as the Annex provided relating to MON 87427 supporting the Commodity Import application for MON 87427 × MON 89034 × 1507 × MON 88017 × 59122.
32. Any other relevant information:	None
33. Attach document:	<i>Not applicable to applicant</i>
34. Notes:	None