



Wissenschaftlerkreis  
Grüne Gentechnik e.V.

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Director Bureau of Plant Industry  
San Andres, Malate, Manila,  
Republic of the Philippines  
By E-Mail: [bpibiotechsecretariat@yahoo.com](mailto:bpibiotechsecretariat@yahoo.com)

21. August 2017

**RE: PROPOSAL FOR DIRECT USE AS FOOD AND FEED, OR FOR PROCESSING  
Provitamin A Biofortified GR2E Rice**

Dear Director,

I write in support of the allowance of the above proposal which appeared, for public comment, in section C2 of the Manila Standard on 25 July 2017.

Vitamin A deficiency remains, in the Philippines as in many other countries, a serious cause of mortality and morbidity, including blindness, for young children, despite current interventions and improving living standards. The deficiency is a nutritionally acquired immune deficiency syndrome, and the most significant cause of under 5 years child mortality as well as the most important cause of childhood blindness.

Provitamin A Biofortified GR2E Rice, also known as Golden Rice, has the proven capacity to provide an additional intervention to combat vitamin A deficiency, with minimal cultural change. Every grain of Golden Rice is labelled with its colour, instantly 'readable' by any level of literacy in any language. The technology has been donated by its inventors for use in developing countries and in public owned rice varieties, and there are no limitations, except export sale, on the use of Golden Rice harvest, which can be locally sold, or replanted by growers. The terms of the licenses in place in The Philippines, and elsewhere, ensure that Golden Rice will cost no more than the white rice variety the nutritional trait has been introduced to. Growers or consumers have no obligation to sign anything, or pay anything for the extra nutrition. The agronomy of the varieties is unaffected by the introduction of the nutritional trait.

Should the regulatory authorities in the Philippines find the science in the regulatory submission to prove Provitamin A Biofortified GR2E Rice to be safe to humans and animals, as whole or processed rice, the Proposal should be allowed.

This will, in time, allow Philippine consumers the choice to consume Provitamin A Biofortified GR2E Rice, or not.

Yours sincerely,

Prof. Dr. Klaus-Dieter Jany  
Chairman