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[Open Letter to U.S. Department of Agriculture's Animal and Plant Health Inspection Service \(APHIS\), Demanding Rejection of ArborGen's Request to Plant 260,000 Genetically Engineered Eucalyptus Trees Across the U.S. Southeast](#)

**The letter has received more than 11,000 endorsements, from both organizations and individuals, from 33 countries.**

To Whom It May Concern, I oppose allowing ArborGen to plant over a quarter of a million GE eucalyptus in 29 field trials over 330 acres for the following reasons:

Approval of these field trials represents precedent setting approval for the large-scale outdoor release of GE Eucalyptus trees that allow flowering and seed formation in young trees. If GE tree flowering and seed production is allowed on the U.S. mainland on this large a scale, it will facilitate the approval of commercial large-scale release of GE eucalyptus or other trees. It will also facilitate the approval of other GE tree flowering field trials of native species like pine and poplar that could contaminate native forests.

APHIS failed to conduct and prepare an Environmental Impact Statement (EIS) to comprehensively address all relevant issues related to the proposed GE Eucalyptus field trials.

Eucalyptus species are introduced organisms in the U.S. and grow well in certain warm climates such as in parts of California and Florida. The cold tolerance trait, if it is expressed as ArborGen intends, will vastly expand the range of this GE eucalyptus hybrid.

Escape of GE cold tolerant eucalyptus hybrids through seeds and vegetative plant material are quite likely due to severe wind and rain events which APHIS failed to assess in the EA. In other countries where eucalyptus have been introduced, they are well known for escaping and colonizing native ecosystems.

Global warming and climate change will allow more extensive southern and southeast regions of the U.S. to have weather patterns conducive to the introduction and propagation of escaped GE Eucalyptus hybrids. These concerns were not adequately addressed in the EA.

The U.S. Forest Service has stated that eucalyptus plantations lower water tables, and affect groundwater recharge and local stream flows, in some cases eliminating seasonal streams. Since the approval of 330 acres of field trials appears poised to facilitate deregulation of these Eucalyptus hybrids, much more extensive study of groundwater impacts is essential, especially in light of existing drought conditions in parts of the South.

In regions where droughts occur, eucalyptus are known to be at high risk of catching fire. Wildfires in eucalyptus groves in Australia this year, which were worsened by a drought, killed 173 people. Some regions of the Southern U.S. are currently in the midst of such a drought. Additionally, eucalyptus

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trees, with deep tap roots, use very large quantities of water. They have been documented to severely deplete ground water and cause or exacerbate drought situations. These concerns were not adequately addressed in the EA.

With recent federal court decisions on genetically engineered perennial organisms like the GE bentgrass and GE alfalfa, for example, there is a growing legal foundation around the potential escape of perennial GE organisms even in field trials.

The fatal fungal pathogen, *Cryptococcus Gattii* has been found in the U.S. It can cause fatal fungal meningitis among people and animals that inhale its spores. One of the eucalyptus species used in the GE eucalyptus hybrids (*E. grandis*) is a known host for *cryptococcus gattii*. Creating extensive habitat for this fatal fungal pathogen is dangerous and foolhardy. These concerns were not adequately addressed in the EA.

I believe the GE eucalyptus field trials should be ended and the trees destroyed before it is too late.