

Open Letter Denouncing Suzano Papel e Celulose's Genetically Engineered (GE) Eucalyptus

To the Chair of the National Technical Commission on Bio-security (CTNBio)
and to the Federal Public Prosecution Service

We hereby denounce the decision made by CTNBio on November 16, 2021, approving the new GE eucalyptus developed by FuturaGene, owned by Suzano Papel e Celulose, for release into the environment, for commercial use and for any other related activities.

The permission granted by CTNBio to plant GE eucalyptus on Brazilian territory is hasty and lacking in foresight. The GE eucalyptus resistant to glyphosate, identified as 751KO32, is a serious threat to life, to society and to nature. Its licensing demands greater precautions.

Approved without any democratic consultation with Brazilian civil society in general and the communities in the neighborhood of the areas where the plantations will be located, the granting of the license is only concerned about the commercial interests of Suzano Papel e Celulose, and not about the detrimental effect on life.

What is "GE eucalyptus"?

This is a technique driven by the interests of large paper and pulp companies to increase the productivity of their eucalyptus and, hence, their profits. The technique of genetic modification is complex and risky: it involves inserting genetic material from a different species into a eucalyptus tree. This gene or genes from the other species have certain characteristics desired by the company, and which the eucalyptus does not possess. In the case of the Suzano GE eucalyptus, the company managed to introduce a gene that made the eucalyptus tolerant to the application of the toxic glyphosate. Used to kill other plants, glyphosate has in its composition an active ingredient that has proven to be carcinogenic.

We wish, therefore, to express our indignation and repudiation of the approval granted for the licensing of the commercial planting of the Suzano GE eucalyptus for the following reasons:

- The approval was granted in the record time of five months, ignoring any previous, free, informed consultation with the communities already living with the impact of eucalyptus monoculture plantations. The company carried out field tests in Açailândia (Maranhão state), Caravelas (Bahia state), Angatuba and Araraquara (São Paulo state), without fully informing the local communities about the tests and the impacts of the activity.
- Resolution 32 of June 15, 2021, made environmental security measures more flexible. In the case of Suzano, CTNBio applied the article of this new resolution that eliminates the need for monitoring, attending merely to the commercial interests of the company.
- GE species threaten biomes and their biodiversity through contamination by way of pollen and seeds, and further increase the already existing impacts, such as the impoverishment of the soil and the contamination of the water-table, directly affecting the lives of those who live in the areas of cultivation.
- The absence of any studies as to the long-term behavior and consequences for the environment and for the life of the GE tree, as well as of other trees that may be contaminated.
- Disrespect of the precautionary principle, emphasized in international conferences on biodiversity, in which Brazil participates. Instead, the CTNBio approved the request made by Suzano in record time. It did this simply on the basis of studies presented by the company itself.
- This is the second approval of GE eucalyptus for the benefit of Suzano. The first, H421, was approved in 2015 and is about a genetically modified eucalyptus designed to guarantee an increase of 20% in the productivity of the tree. At the time, the company claimed that the measure

would increase “competitiveness and bring about environmental and socio-economic gains through greater productivity, using less land and, therefore, fewer chemical products in general, with lower carbon release, as well as making land available for the production and conservation of foodstuffs”. (1)

Since 2015, however, when Suzano had 524,000 hectares of monoculture eucalyptus production to supply its pulp factories (2), its area of eucalyptus has almost tripled to 1,364,000 hectares in 2020 (3), making Suzano the largest company in Brazil and one of the largest in the world.

In order to justify the construction of its new factory in Mato Grosso do Sul state (4), the company used the fragile and unproven argument that gains in productivity result in fewer plantations. In practice, with genetic modification the company stands to increase its concentration of land, according to the denouncement made in 2015 by hundreds of national and international organizations. (1)

- A major concern in 2015 was that, with the first licensing of GE eucalyptus, in the future we will inevitably have honey in Brazil contaminated with traces of GE eucalyptus pollen, as eucalyptus trees are one of the main sources of pollen for the 350,000 honey producers and meliponiculturists in the country. (5)

- Equally problematic is the second GE eucalyptus. It is very much in Suzano’s interests because a monoculture of eucalyptus resistant to glyphosate would effectively prevent the survival of other species, creating a green desert even emptier than the current plantations, with far more harmful effects on health and the environment.

Over time, pests and weeds develop resistance to agrotoxins such as glyphosate, and more intense spraying becomes necessary. The use of glyphosate in Brazil has increased since the introduction of glyphosate-resistant soybeans.

- It is important to remember that when GE eucalyptus leads to the expansion of plantations, it also contributes to the enhancement of other impacts. In the case of Suzano, widespread socio-environmental degradation gets worse every year. The Suzano eucalyptus is the enemy of peasant populations, indigenous people, quilombola communities, babaçu nut breakers and other traditional peoples and groups. The enormous amount of documentation that exists on this subject was apparently not taken into consideration by CTNBio.

- We also wish to highlight the impacts on water in a country that is already “drying up” as a result of non-stop deforestation and climate chaos, phenomena to which the expansion of Suzano has contributed: the degradation of countless streams and rivers where eucalyptus is planted on a large scale.

- Suzano continues to plant eucalyptus in Pataxó territories – through its subsidiary Veracel - and quilombola territories in Bahia state, and in quilombola lands in Sapê do Norte in Espírito Santo state, as well as surrounding lands used by babaçu nut breakers in Maranhão. Communities resist, as is the case of the quilombolas and their retomadas (small occupations of quilombola lands to produce food and rehabilitate forest and water sources) and the MST (Movement of Rural Landless Workers) with its land occupations, while denouncing the slowness of the Brazilian state in regularizing these territories, and the truculence of the company on a daily basis. Despite everything, these communities produce food and help to feed a population that increasingly faces hunger and misery.

Meanwhile, Suzano is interested only in concentrating more lands, obstructing wherever possible the regularization of community lands and the agrarian reform. And for what? To be able to increase the wealth of its major shareholder, the Feffer family in São Paulo, a family that have long been billionaires and are one of the richest in the country.

For all these reasons, we request the immediate revocation of the license granted for the use of Suzano GE eucalyptus 751KO32, as well as the action and intervention of the Federal Public Prosecution Service to revoke the decision made by the CTNBio, a decision made without a full

public debate, especially in regions of Brazil that have been exposed for many years to eucalyptus monoculture.

Sign-on here: <https://bit.ly/3t0yki0>

Signatories:

BRAZILIAN ORGANIZATIONS

Rede Alerta Contra o Deserto Verde

Campanha Permanente Contra os Agrotóxicos e Pela Vida

Acesso Cidadania e Direitos Humanos

Amigos da Terra Brasil

Associação de Meliponicultores do Estado do Espírito Santo - AMES-ES

Associação dos pequenos produtores e moradores de Xuri Vila Velha – ES

Associação Mães e Pais pela Democracia

Associação quilombola de volta miúda caravelas Bahia

Baía Viva

Coletivo Raízes do sapê

Comissão Nacional de Fortalecimento das Reservas Extrativistas e dos Povos e Comunidades
Tradicionais Costeiros e Marinheiros do Brasil-CONFREM

Coordenação Nacional de Articulação das Comunidades Negras Rurais Quilombolas–CONAQ

Comissão Pastoral da Terra - CPT

FASE-ES

Fórum Carajás

Fórum da Amazônia Oriental-FAOR

Fórum Mudanças Climáticas e Justiça Socioambiental-FMCJS

Fórum Permanente em Defesa da Vida

Fóruns e Redes de Cidadania do Maranhão

Fundação Padre José Koopmas

Movimento Ciência Cidadã

Movimento Cultural Arte Manha

Movimento de Luta pela Terra – MLT

Movimento de Pescadores e Pescadoras Artesanais – MPP

Movimento dos Atingidos pela Mineração – MAM

Movimento dos Pequenos Agricultores – MPA

Movimento dos Trabalhadores Rurais Sem-Terra - MST

Movimento Interestadual das Quebradeiras de Coco Babaçu-MIQCB

Movimento Quilombola-Coordenação Estadual ES

Pastoral da Juventude Rural – PJR

Pretaria.Org

Rede de Agroecologia do Maranhão

Terra de Direitos

Via Campesina Brasil

Viola de Bolso arte e memória cultural

Signatures in solidarity:

INTERNATIONAL ORGANIZATIONS

Acción Ecológica	Ecuador
Alianza Biodiversidad	Latinoamérica
Biofuelwatch	USA
Campaign to Stop GE Trees	Internacional
Canadian Biotechnology Action Network (CBAN)	Canada
Consejo del Pueblo Maya CPO	Guatemala
ETC Group	Mexico
Family Farm Defenders (U.S.)	USA
Forum Ökologie & Papier	Germany
Fundação Montescola	España
GE Free New Zealand in Food and Environment	Aotearoa/New Zealand
GE Free Northland	New Zealand
GeneEthics	Australia
Global Justice Ecology Project	USA
GMO Free USA	USA
GMWatch	UK
Heartwood	USA
Indigenous Environmental Network	USA
Institute for Social Ecology	USA
Japan International Volunteer Center (JVC)	Japan
Marcha Mundial das Mulheres	Internacional
Movimiento de comunidades en defensa del agua Qana Choch	Guatemala
Movimiento Social Intercultural del Pueblo de Ixcán	Guatemala
MOVUS – Movimiento por un Uruguay Sustentable	Uruguay
Ofraneh	Honduras
OLCA – Observatorio Latinoamericano de Conflictos Ambientales	Chile
Otros Mundos Chiapas, México	México
Rapal-Uruguay	Uruguay
RECOMA – Red Latinoamericana contra los Monocultivos de Árboles	Latinoamérica
Red Ecuatoriana de Alternativas a la Palma Aceitera	Ecuador
Red Mesoamericana frente a la Palma Aceitera	Mesoamérica
Red por una América Latina Libre de Transgénicos	Ecuador
REDES Amigos de la Tierra Uruguay	Uruguay
Rettet den Regenwald	Germany
Salva La Selva	España
WRM – World Rainforest Movement	Internacional
Abibinsroma Foundation	Ghana

Alberta Organic Producers Association	Canada
Alianza basura cero chile	Chile
Animal Interfaith Alliance	UK
Animals Are Sentient Beings, Inc.	USA
Asociacion de Cultura Latinoamericana	USA / Chile
Associazione Medici per l'Ambiente - ISDE Italia	Italia
Aztlan Media - 2024	USA
Biodiversity Information Box	JAPAN
Bioscience Resource Project	USA
Bund für Umwelt und Naturschutz Deutschland (BUND)	Germany
Caldera Environment Centre (Murwillumbah)	Australia
Carbone Guinee	Guinea
Censat Agua Viva - Amigos de la Tierra Colombia	Colombia
Centro de estudios Heñói	Paraguay
Earth Action, Inc.	USA
Earth Action, Inc.	USA
Extinction NS	Canada
Florida Keys Environmental Coalition	USA
Focus Association for Sustainable Development	Slovenia
FORCERT - Forests for Certain: Forests for Life!	Papua New Guinea
Fort Berthold Protectors of Water and Earth Rights	Canada
Friends of the Earth Japan	Japan
Fundación Pongo	Chile
Gap Mountain Goats	USA
GMO Free Canada	Canada
GMO/Toxin Free USA	USA
GMOScience	USA
Grassroots Center for Agroecology	USA
grassroots foundation	Germany
GreenRoots	USA
Grupo de Investigación de Suelo y Agua (GISA)	Venezuela
Grupo Guayubira	Uruguay
Iniciativa Arcoiris de Ecología Política	Argentina
International Society Doctors for the Environment - ISDE	Switzerland
Justica Ambiental - JA!	Mozambique
Justicia Paz e Integridad de la creación Claret CR	Costa Rica
Last Tree Laws	USA
Latin American Solidarity Committee of the Western New York Peace Center	USA
Mangrove Action Project	USA

MCS-Global	Canada
Missionary Society of Saint Columban	Japan
National Family Farm Coalition	USA
Nicaragua Center for Community Action	USA
No More GMOs - Toronto	Canada
Northwest BC Coalition for Alternatives to Pesticides	Canada
Organic Agriculture Protection Fund (SaskOrganics)	Canada
Rainforest Action Network	USA
Red de Acción por los Derechos Ambientales RADA	Chile
Regeneration International	USA
RESTORE: The North Woods	USA
Save Estonia's Forests	Estonia
Save Our Seeds (SOS)	Germany
Somi-Micla (Misioneros Claretianos de America)	Republica Dominicana
SUHODE Foundation	Tanzania
The Democracy Center	USA
The Enviro Show	USA
Toronto Non-GMO Coalition	Canada
Toronto Raging Grannies	Canada
UNIÓN UNIVERSAL Desarrollo Solidario	España
Vigilance OGM	Canada
Water Justice and Gender	Netherlands
Water Justice and Gender	Perú

Sign-on here: <https://bit.ly/3t0yki0>

NOTES

1. <https://www.wrm.org.uy/all-campaigns/open-letter-to-be-sent-to-the-brazilian-national-technical-biosafety-commission-ctnbio>
2. https://s1.q4cdn.com/987436133/files/doc_downloads/sustainability_reports/pt/Relatrio-de-Sustentabilidade-2015-Suzano.pdf
3. <https://r2020.suzano.com.br/wp-content/uploads/2021/05/RelatorioSuzano2020.pdf>
4. <https://www.suzano.com.br/suzano-investira-r-147-bilhoes-na-construcao-de-nova-fabrica-de-celulose-no-mato-grosso-do-sul/>
5. http://www.esalq.usp.br/acom/clipping/arquivos/05-03_eucalipto_trangenico_CA.pdf and <https://oglobo.globo.com/brasil/sustentabilidade/eucalipto-transgenico-ameaca-mel-organico-14379745>