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TO Board Members
FROM: Lebelle Hicks, PhD DABT
RE: Pending Registration of Syngenta's *Bt*-Corn Vegetative Insecticidal Protein Varieties

December 7, 2009

The three products pending registration are:

1. MIR 162 Maize (EPA# 67979-14), containing Vip3Aa20 protein
2. Agrisure 2100, a cross between Bt11 x MIR162 (EPA# 67979-12), with Cry1Ab and Vip3Aa20 proteins
3. Agrisure 3100, a cross between Bt11 x MIR162 x MIR604 (EPA# 67979-13), with Cry1Ab; mCry3a and Vip3Aa20 proteins

The *Bt* proteins found in currently registered, genetically modified corn products are crystalline (Cry) forms created during the bacterial sporulation process. However, Vip3Aa20 is a Vegetative Insecticidal Protein (VIP), so named because it is formed in the vegetative portion of the bacteria's life cycle. The Cry proteins, Cry1Ab and mCry3a, found in the Syngenta products under consideration, are present in previously registered *Bt*-corn varieties.

With regard to the VIP proteins, the sole toxicity data reviewed were the EPA-required studies. Similar to the Cry proteins, there was no acute toxicity observed, the proteins were unstable in gastric fluid, and they lacked homology to known toxic proteins and allergens. The product labels are attached.

These products are not under the review of the PIP Technical Committee because the refuge requirement is 20%.

