

Director,
Competition Commission of India,
HT House,
New Delhi
Date: 9/04/17

Dear Sir,

SUB: Public Feedback on the Dupont Dow Combination Application

The Competition Commission of India (*Commission*) is investigating into the combination between E. I. du Pont de Nemours and Company (*DuPont*), The Dow Chemical Company (*Dow*), DowDuPont Inc. (*DowDuPont*), Diamond Merger Sub Inc. (*Diamond Merger Sub*), and Orion Merger Sub Inc. (*Orion Merger Sub*), having their registered office address at 2030 Dow Center, Midland, Michigan, 48674, United States of America (for Dow, DowDuPont, Diamond Merger Sub, and Orion Merger Sub) and 974 Centre Road, Wilmington, Delaware 19805, United States of America (for DuPont).

Under Section 29(2) of the Competition Act 2002, the Competition Commission of India, if it is of the prima facie opinion that the combination has, or is likely to have, an appreciable adverse effect on competition, shall direct the parties to the said combination to publish details of the combination for bringing it to the knowledge or information of the public and persons affected or likely to be affected by such combination. In accordance with the provisions of Section 29(2) of the Act, the Hon'ble Commission requires E. I. du Pont de Nemours and Company, The Dow Chemical Company, DowDuPont Inc., Diamond Merger Sub Inc., and Orion Merger Sub Inc. to publish details of the proposed combination

After reviewing Dow/Dupont application for merger we as Navdanya, a network of organic farmers and seeds savers and organic consumers concerned about our health and the health of citizens of India, write to you, seeking the rejection of the application for the merger between the Dow and Dupont based on the objective of the Competition Act which is **to protect the interests of consumers and to ensure freedom of trade carried on by other participants in markets, in India.**

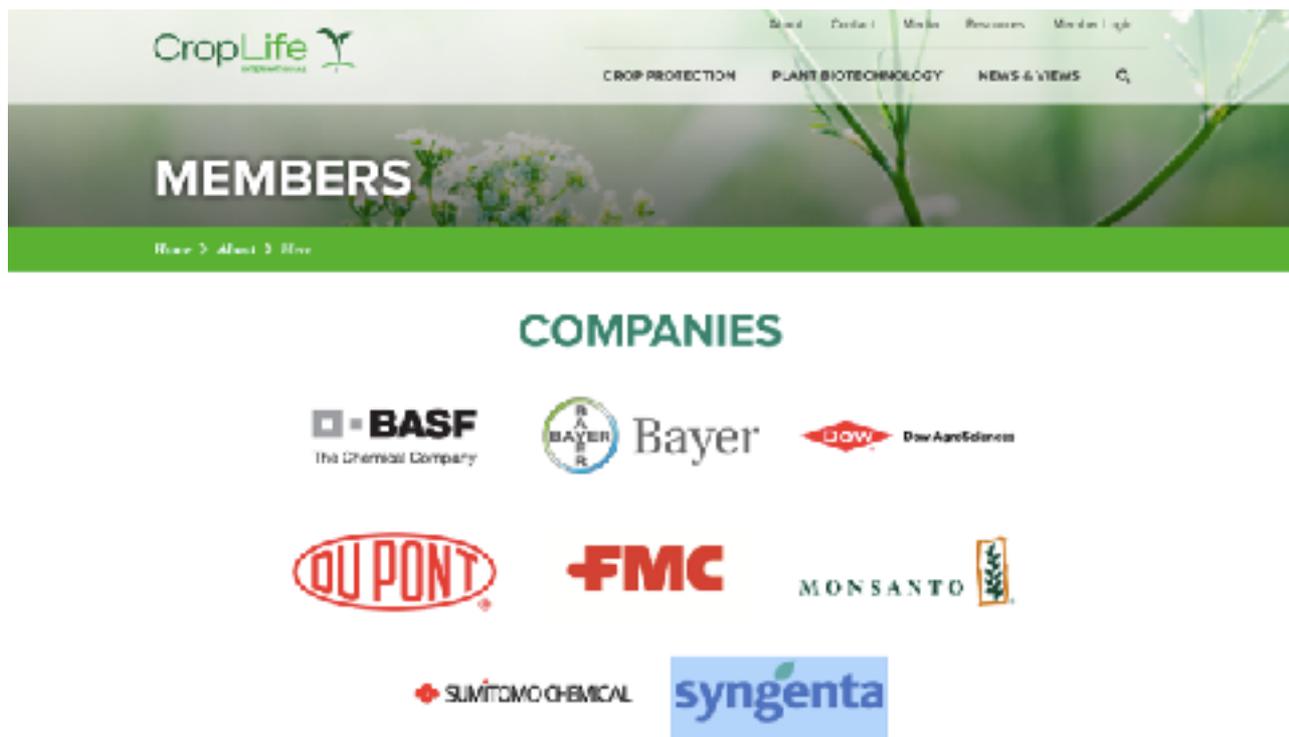
India is a land of small farmers. They are the "other participants in markets in India" breeding and conserving seeds, producing diverse, healthy food for India's citizens and consumers. The right to safe and affordable seed, right to life and livelihood, and the right to produce healthy and safe food of our small farmers will be directly impacted by the merger of Dow Dupont. The rights of consumers to safe food, to independent and reliable knowledge and information on food safety will also be affected for the following reasons

1. Misleading, incorrect information and Conflict of Interest

The complete data submitted to the CCI and put in public domain is created by the corporations themselves and is not from a “third independent party”. The dossier submitted by Dupont-Dow says

“Note: The market shares are based on 3rd party independent database, i.e., CropLife India (for value shares) and GfK Sigma’s Agrowin dataset (for volume shares).”

CropLife cannot be categorised as independent third party since Dow, Dupont are both members of the CropLife. Hence there is a direct conflict of interest. (please find document attached).



Source: <https://croplife.org/about/members/>

On the basis of this information, CropLife assessment should not be considered by the CCI as the two merging companies are members of these organisations. The validity and veracity of the information is highly questionable. The CCI should act upon and also investigate the claims of Agrowin database also before their assessment is taken into consideration.

We know that they have submitted manipulated data to show depreciated market shares and purposefully given misleading information to show that they have below 15% of the over call market share. Far from the dossier being third party, the entire data is provided by the corporations themselves.

2. Creation of global monopoly and Cartel with Dow/DuPont, Monsanto/Bayer and Syngenta/ ChemChina

Article 2c of the Competition Act defines a Cartel as follows

(c) “cartel” includes an association of producers, sellers, distributors, traders or service providers who, by agreement amongst themselves, limit, control or attempt to control the production, distribution, sale or price of, or, trade in goods or provision of services;

The mergers , acquisitions and agreements between Dow Dupont needs to be assessed in the context of other mergers and agreements between Monsanto-Bayer , Syngenta ChemChina which will result in a cartel of 3 giant seed/chemical companies controlling our food and agriculture with major impact on the rights of farmers as well as consumers

The crop and seed industry is being reshaped by a series of large combinations that may end up leaving just a few global players who can offer a comprehensive range of products and services to farmers.

Global agro-chemicals firms are racing to consolidate, due to the growing convergence between seeds and pesticides markets, as well as large investment firms becoming major shareholders.

(i) DuPont and Dow Chemical

When DuPont and Dow Chemical agreed to merge in December 2015, the \$130 billion deal seemed to be a prime example of American managers' ruthless pursuit to building monopoly positions. These companies would combine and then split into three new firms, focused on agriculture, speciality products (used, for example in electronics), and materials (used in plastics).

What has been clearer since then is that Dow-DuPont is also, part of a global trend: a wave of consolidation in the agricultural seeds and chemical industry.

(ii) Chem-China and Syngenta

.Chem-China is buying Syngenta for \$43 billion after Syngenta rejected a bid from Monsanto, while Dow and DuPont are forging a \$130 billion business. German crop chemical 'Bayer' has offered to buy U.S. seed company Monsanto for \$66 billion in cash. Three trends explain the surge in activity.

China's National Chemical Corp (Chem-China) in February 2016 agreed to acquire Syngenta or about \$43 billion months after Monsanto abandoned its own bid for Syngenta, a Swiss firm (Bloomberg, 2016a).

For the Chinese authorities, the investment in Syngenta is also of great strategic value, given "their high anxiety about food security". For a country with 22 per cent of the world's population and only 7 per cent of its arable land, it is no wonder that "every time they produce a new five-year plan, food security is right on their radar".

Crop protection generated \$10 billion of Syngenta's global sales of \$13.41 billion in 2015, with seeds contributing \$2.84 billion. The company's revenues in India amounted to Rs.2,904.75 crore for FY15, with an estimated 60 per cent coming from crop protection and the balance 40 per cent from seeds.

Syngenta has the second largest share of India's roughly Rs. 20,000 crore agro-chemical market, which also has other major like DuPont, Rallis India. UPL Ltd. BASF and Dhanuka Agrotech. It also claims to be No. 1 in hybrid sunflower and vegetable seeds - especially of tomatoes, cauliflower, hot pepper, sweet corn, radish and watermelon - apart from having No. 3 position in corn and rice (Damodaran, 2016a).

(iii) Bayer and Monsanto

In mid-September, 2016, Bayer's \$66 billion (Rs. 4.62 lakh crore) all-cash offer to buy Monsanto, which has created flutter globally around the world, is bound to have a strong resonance in India as well, if and when the

deal is sealed, the seed industry and research in the country could feel the impact (Indian Express, 2016a), (Reuters, 2016).

Earlier in May 2016, Bayer had made unsolicited \$62 billion cash offer to acquire Monsanto which was rejected. (Bloomberg, 2016a), (Bloomberg, 2016b).

Both multinationals have a significant presence in India. Bayer Crop Science and Monsanto India are also listed on stock exchanges and play an active role in the advocacy of biotech-led agriculture (Kurmanath, 2016).

Globally, it will take some time for the two entities to complete the merger as it requires statutory and regulatory clearance. In India, experts feel that it could ultimately lead to an increase in prices of seed and crop protection products.

Bayer's 'Liberty' Link line of weed killers, plus crops that are resistant to it, are an important alternative for farmers suffering from weeds that have grown resistant to Monsanto's 'Roundup' herbicide.

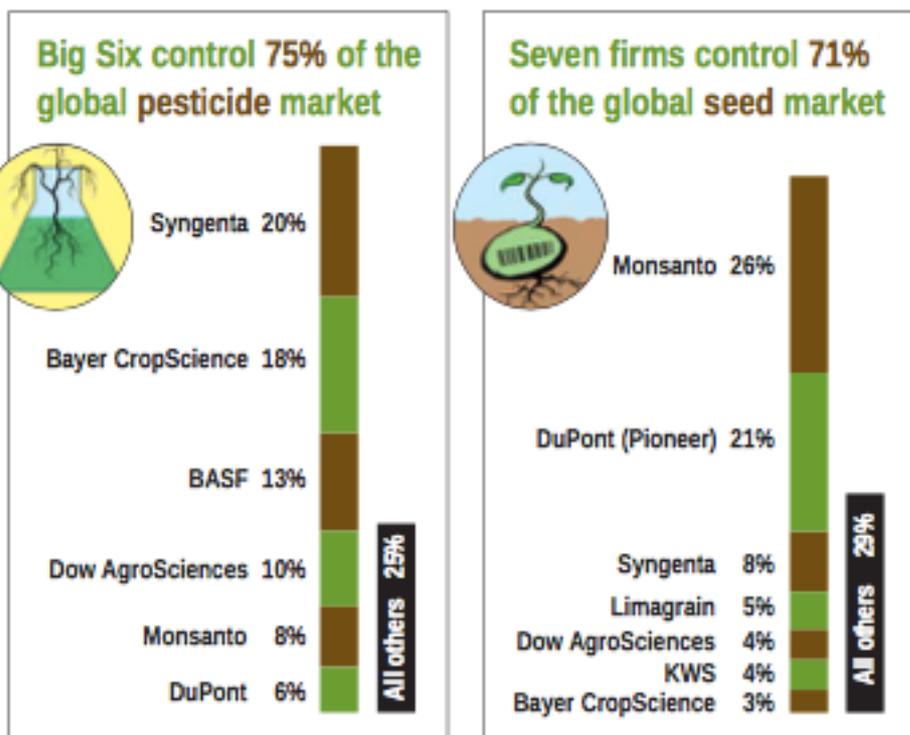
Buying Monsanto would create the world's biggest supplier of farm chemicals and seeds. Monsanto is the largest seed supplier of genetically modified crops, particularly corn and soyabean grown in the USA. Monsanto also sales corn and soyabean seeds in Latin America. However, farmers are finding it difficult to justify the high cost of GM seeds. Spending on GM Seed, has quadrupled since 1996 when Monsanto became the first company to launch GM Seeds (Bunge, 2016).

Once, Monsanto is integrated with Bayer, Monsanto brand could disappear from the market. However, Environmentalists fear that the combined group's dominant position in the seeds & pesticide could lead to higher prices, limit consumer choice and open door to GM Crops in Europe (AFP, 2016).

Bayer's acquisition of Monsanto is the biggest all cash deals in the history. Monsanto has gone from the hunter to the hunted, having tried and failed to buy Syngenta.

Despite its pre-eminence in seeds, Monsanto has become vulnerable to a takeover as a number of problems piled up this year. The company has cut its earning forecast and become locked in disputes with the governments of Argentina and India (Bloomberg, 2016b).

Bayer's move to combine its crop chemicals business - the world's second largest after Syngenta AG - with Monsanto's industry leading seeds business, is the latest in a series of major tie-ups in the agro-chemicals sector. The German company is aiming to create a one-stop shop for seeds, crop chemicals and computer-aided service to farmers.



The Bayer-Monsanto deal will be the largest ever involving a German buyer, beating Diabler's tie-up with Chrysler in 1998, which valued the US carmaker at more than \$40 billion.

It will also be the largest all-cash transaction on record, ahead of brewer InBev's \$60.4 billion offer for Anheuser-Busch in 2008.

Bayer shall pay 16.1 times Monsanto's forecast core yearly earning for 2017 more than 15.5 times Chem-China agreed to pay for Syngenta last year. Bayer offered 44 percent premium to Monsanto's share price (Reuters, 2016).

III. CONSEQUENCES OF MERGER: CREATION OF AN 'OLIGOPOLY'/CARTEL

According to experts the above deals will lead to creation of an 'oligopoly', with three entities (Syngenta-ChemChina, DuPont-Dow and Bayer-Monsanto) controlling two-thirds of the global agri-chemical business and over 60 per cent of the seed markets as explained in the table 1a and 1b and figure 1 given below:

Table 1a: Market Share by Sales (Percentage)

Entities	Agro-Chemicals	Seeds
Bayer-Monsanto	24.6	30.1
ChemChina-Syngenta	25.8	7.9
DuPont-Dow	15.0	22.7
Others	34.6	39.3

(Kurmanath, 2016)

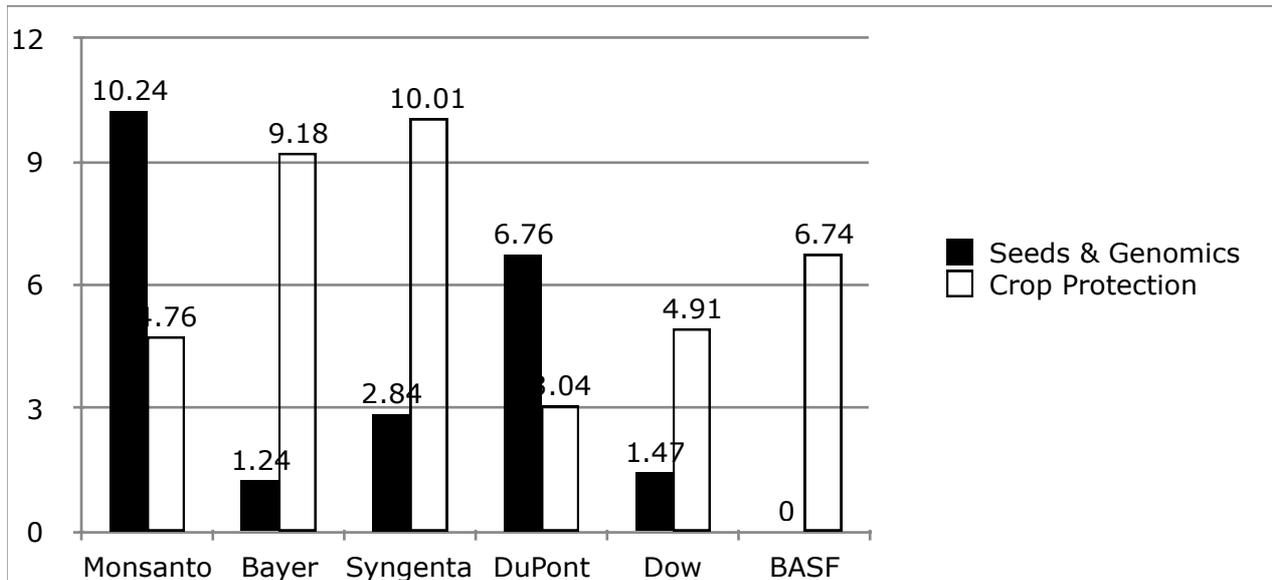
Table 1b gives the sale of Seed and Agro-Chemical giants in 2015.

**Table 1b: Sale of Seed and Agro-Chemical Giants
(Billion dollars) in 2015**

Company	Seeds	Crop Protection	Total
Monsanto	10.24	4.76	15.0
Bayer	1.42	9.18	10.6
Syngenta	2.84	10.01	12.85
Du Pont	6.76	3.04	9.80
Dow	1.47	4.91	6.38
BASF	NA	6.46	6.46
Total	22.73	38.36	61.09

(Indian Express, 2016b)

Figure 1: Seed and Agro-Chemical Giants



(Indian Express, 2016b)

When the resources are concentrated in a few hands, their bargaining power will go up and it will have an adverse impact on the interest of farmers in Third World countries, like ours.

When two firms with strong research and marketing resources joint hands, they will have better bargaining power and this could lead to an increase in seed prices, resulting in the creation of an 'oligopoly'.

Starting from a scenario in which there were a large number of independent seed companies in the mid-1990s, the industry evolved along directions that resulted in the six leading companies - Monsanto, Syngenta, Bayer, DuPont, Dow, Chemical and BASF - controlling close to two-thirds of the global seed market. Now there is a possibility that these six would make way for four entities with a similar market share in seeds and a huge presence in agro-chemicals (Chandrasekhar, 2016).

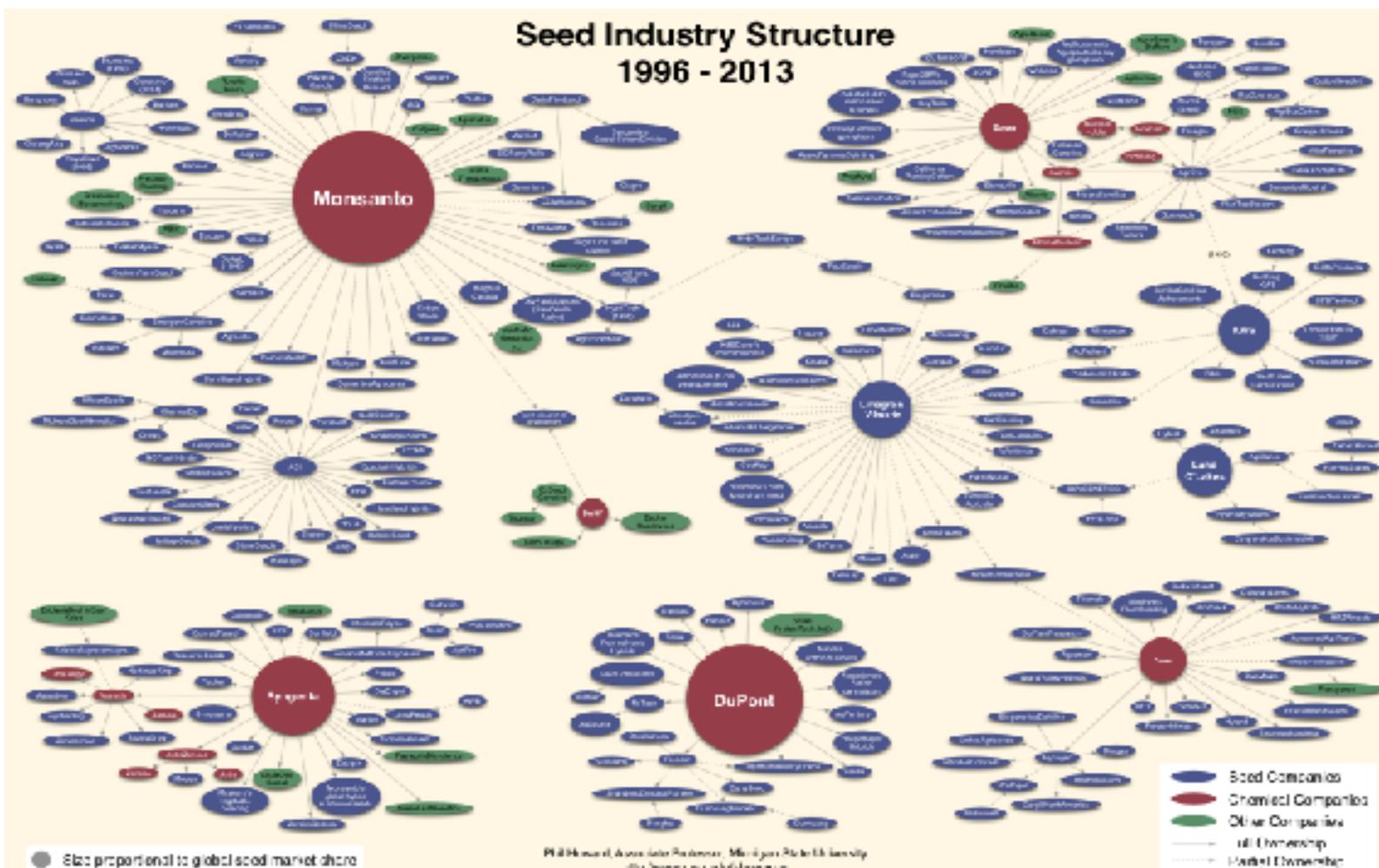
- **Three entities (Syngenta-ChemChina, DuPont-Dow and Bayer-Monsanto) shall be controlling two-thirds of the global agri-chemicals business and over 60 per cent of the seed markets.**
- **When the resources are concentrated in a few hands, their bargaining power will go up and it will have an adverse impact on the interest of**

farmers in Third World countries, like ours. This would result in the creation of an 'Oligopoly'.

- The CCI has found Monsanto in violation of the competition law and has ordered an investigation into complaints filed against it by the agriculture ministry and three other seed companies. The Commission might impose a penalty on Monsanto or ask it to compensate farmers who were forced to pay higher prices for its seed.

The last big merger of the agriculture-science industry happened in 2002 when Bayer acquired Aventis CropScience to form Bayer CropScience (which is the world No. 2 in crop protection behind Syngenta). Even Syngenta was the product of a merger, in 2000, of the agribusiness divisions of Novartis and Astra Zeneca.

(Source: <https://msu.edu/~howardp/seedindustry.html>)



Poison Cartel.Toxic Capital.

The Vanguard Group, Inc.
 Morgan Bank Investment Management
 Northern Cross LLC
 Jupiter Asset Management Ltd.
 Invenity Management & Research Co.
 LIFECAD Investment Management
 Arden Partners LP
 Credit Suisse AG
 Capital Research & Management Co. (World Investor)
 Syngenta AG



PIONEER
 A DuPont Company
BASF
 We create chemistry

The Vanguard Group, Inc.
 Morgan Bank Investment Management
 Northern Cross LLC
 Fidelity Management & Research Co.
 Capital Research & Management Co. (Global Investor)
 Jupiter Asset Management Ltd.
 LIFECAD Investment Management
 Arbor Partners LP
 Credit Suisse AG
 Capital Research & Management Co. (World Investor)
 as of 31 Dec 2015

Capital Research & Management Co. (World Investor)
 The Vanguard Group, Inc.
 ESG Funds Management, Inc.
 Jack & Jill Fund Advisors
 Titan Fund Management LP
 T. Rowe Price Associates, Inc.
 Invenity Management & Research Co.
 Highfolds Capital Management LP
 Northern Trust Investment Inc.
 Oaktree Capital Management LLC

syngenta



Capital Research & Management Co. (World Investor)
 The Vanguard Group, Inc.
 Invenity International Asset Management LLC
 Morgan Bank Investment Management
 State Street Global Advisors Ltd.
 BlackRock Fund Advisors
 Massachusetts Financial Services Co.
 BlackRock Asset Management Overseas Ltd AG
 Arundel Asset Management LP (Investment Management)
 Dreyfus & Co.

The Vanguard Group, Inc.
 ESG Funds Management, Inc.
 BlackRock Fund Advisors
 Capital Research & Management Co. (World Investor)
 T. Rowe Price LLC
 Invenity International Asset Management LLC (Global Investor)
 Wellington Management Co. LLP
 Northern Trust Investments, Inc.
 Capital Research & Management Co. (International Investor)
 Tankin Advisors, Inc.

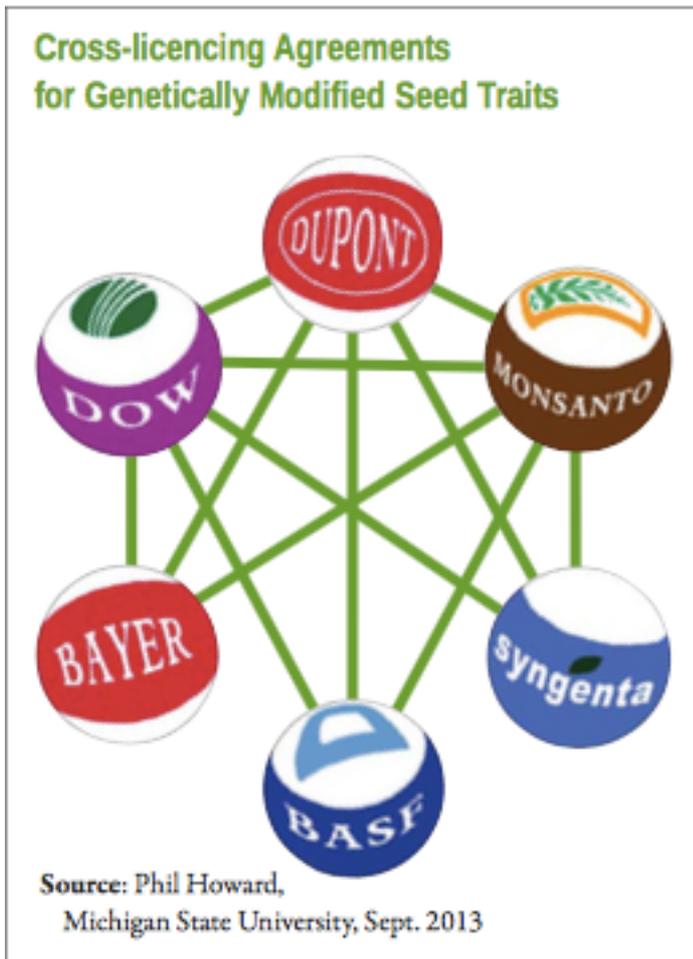
Capital Research & Management Co. (Global Investor)
 The Vanguard Group, Inc.
 ESG Funds Management, Inc.
 BlackRock Fund Advisors
 Massachusetts Financial Services Co.
 Glenfow Capital Management LLC
 Fidelity Management & Research Co.
 Swiss Capital Management LLC
 PIMCO Management Co.
 Davy Sproule Advisors LP



MONOPOLY



NWDVVM



Besides merging , the chemical-seed giants also have cross licensing arrangements as the Seed Industry structure below shows .Dupont andMonsanto have agreements .

<http://www.dupont.com/corporate-functions/media-center/press-releases/monsanto-dupont-sign-dicamba-supply-agreement.html>

Dow Monsanto have agreements

<https://www.dowagro.com/en-us/newsroom/pressreleases/2016/10/monsanto-dow-agrosciences-global-licensing-agreement-exzact>

It is in this context of a handful of corporations working in partnership to reduce the options for both farmers and consumers that the merger should be evaluated in accordance with 2.b of the Competition Act in addition to 2 a

3. Common Ownership through Common Shareholders

India is steeped in synthesized controversy, created by Monsanto on the first GM crop supposedly-approved for commercialization in India. Engaged in litigation on many fronts, Monsanto is trying to subvert our Patent Law, our Plant Variety and Farmers Rights Act, our Essential Commodities Act , our Anti Monopoly Act (Competition Act). It is behaving as if there is no Parliament, no Democracy, no Sovereign Laws in India to which it is subject. Or, it simply does not have any regard for them. Despite different Company names both Dupont and Dow have common owners these include the Vanguard Group Inc, BlackRock Fund Advisors, SSgA Funds Management Inc. (Further please see table attached.

In another theatre, Monsanto and Bayer are merging. With Bayer's \$66 billion bid for Monsanto, mega mergers are in the news But as their history and ownership shows , they have always been "merged " .

Monsanto and Bayer have a long history. They made explosives and lethally poisonous gases using shared technologies and sold them to both sides of both the World Wars. Bayer was part of IG Farben, Hitler's economic power and pre-war Germany's highest Foreign Exchange earner, with offices in the United States and Switzerland.

Monsanto entered into a joint venture with IG Farben, Hitler's supplier of Zyklon-B, a cyanide based pesticide used in concentration camps during the holocaust. Zyklon-B was used as evidence in the Nuremberg trials, finding IG Farben guilty of war crimes. Monsanto and Bayer also had a Joint Venture – MOBAY. Mobay supplied ingredients for Agent Orange in the Vietnam War. 20 million gallons of Mobay defoliant and herbicides were sprayed over South Vietnam. Children have been born with birth defects, adults have chronic illnesses and cancers, due to their exposure to Mobay's chemicals. Monsanto and Bayer's cross licensed Agent Orange resistance has also been cross developed for decades. Wars were fought, lives were lost, countries carved into holy lands – with artificial boundaries that suit colonisation and resource grab – while Bayer and Monsanto sold chemicals as bombs and poisons.

They were one as MOBAY, part of the Poison Cartel of IG Farben. Controlling stakes of both Corporations lies with the same private equity firms. The expertise of these companies is those of war. IG Farben - Hitler's economic power and pre-war Germany's highest foreign exchange earner - was also a foreign intelligence operation. Herman Shmitz was President of IG Farben, Shmitz's nephew Max Ilgner was a Director of IG Farben, while Max's brother Rudolph Ilgner handled the New York arm of the 'VOWI' Network as Vice President of CHEMNYCO.

Paul Warburg - brother of Max War-burg (Board of Directors, Farben Aufsichtsrat) - founded the Federal Reserve System in the United States. Max Warburg and Hermann Schmitz played a central role in the Farben Empire. Other "guiding hands" of Farben Vorstand included Carl Bosch, Fritz ter Meer, Kurt Oppenheim and George von Schnitzler. Every one of them was adjudged 'War Criminals' after World War II, except Paul War-burg.

Monsanto and Bayer have a long history. They made explosives and lethally poisonous gases using shared technologies and sold them to both sides of both the World Wars. The same war chemicals were bought by the Allied Powers and the Axis Powers, from the same manufacturers, with money borrowed from the same federated reserve bank.

MOBAY (MonsantoBayer) supplied ingredients for Agent Orange in the Vietnam War. 20 million gallons of MOBAY defoliants and herbicides were sprayed over South Vietnam. Children are still being born with birth defects adults have chronic illnesses and cancers, due to their exposure to MOBAY's chemicals. Monsanto and Bayer's cross-licensed Agent Orange Resistance has also been cross-developed for decades. Wars were fought, lives were lost, countries carved into holy lands – with artificial boundaries that suit colonization and resource grab – while Bayer and Monsanto sold chemicals as bombs and poisons and their brothers provided the loans to buy those bombs.

More recently, according to [Monsanto's website](#) Bayer CropScience AG and Monsanto Co. have "[entered into a series of long-term business and licensing agreements related to key enabling agricultural technologies](#)". This gives Monsanto and Bayer free access to each other's herbicide and the paired herbicide resistance technology. Through cross licensing agreements like these, mergers and acquisitions, the biotech industry has become the IG Farben of today, with Monsanto in the cockpit.

The Global Chemical and GMO industry - Bayer, Dow Agro, DuPont Pioneer, Mahyco, Monsanto and Syngenta - have come together to form Federation of Seed Industry of India (FSII) to try and become bigger bullies in this assault on India's farmers, the environment, and democratically framed laws that protect the public and national interest. This is in addition to the lobby-group ABLE, the Association of Biotechnology Led Enterprises, which tried to challenge India's Seed Price Control order issued under the Essential commodities Act, in the High Court of Karnataka. The case was dismissed.

The new Group is not "seed Industry", they produce no seeds. And they try to stretch patents on chemicals to claim ownership on seed, even in countries where patents on seeds and plants are not allowed by law. This is the case in India, Argentina, Brazil, Mexico, and many other countries.

All the Monsanto cases in India are related to Monsanto un-scientifically, illegally and illegitimately claiming patents on seed, in contempt of India's laws, and trying to collect royalties from the Indian seed industry and Indian farmers. The FSII is an "IG Farben 100 Year Family Reunion", a federation is a coming together of independent and autonomous entities.

The Farben family chemical cartel was responsible for exterminating people in concentration camps. They embody a century of ecocide and genocide, carried out in the name of scientific experimentation and innovation. Today the poison cartel is wearing G-Engineering clothes, and citing the mantra of "innovation" ad nauseum. Hitler's concentration camps were an "innovation" in killing. 100 years later, the Farben Family is carrying out the same extermination, silently, globally, much more efficiently.

Monsanto's "innovation" of collecting illegal royalties and pushing Indian farmers to suicide is also an innovation in killing without liability, indirectly. Just because there is a new way to kill does not make killing right, or a right. "Innovation" like every human activity, has limits - limits set by ethics, justice, democracy, the rights of people, the rights of nature.

IG Farben was tried at Nuremberg. We have national laws to protect people, their right to life and public health, and the environment. India's Biosafety laws and Patent, and Plant Variety Act are designed to regulate greedy owners of corporations - with a history of crimes against nature and humanity.

<http://m.thehindubusinessline.com>

At the core of socio economic assessment is the issue of monopolies and cartels and impact on small farmers. Even though patents on seeds are not allowed, for more that one and a half decade Monsanto has extracted illegal royalties from Indian farmers, trapping them in debt, and triggering an epidemic of farmers' suicides. Monsanto's war on India's foot soldiers - farmers - is a war being waged by the Farben Family, on our Earth Family.

The merger is merely been an accounting and liability-reduction exercise within the much larger conglomerate of Industrial chemical agriculture and biotechnology. There is no competition between Big Ag and Biotech Corporations. They have been one in terms of past and present partnerships , and in terms of their common ownership. In India, even the distribution channels of chemicals, seeds and the credit farmers take to buy these toxics, are the same for Bayer and Monsanto.

On 25th March 2016 , the India Competition Commission blocked the Monsanto Bayer merger . While this is an important step, we need to continue building the movements to prevent increasing corporate control over our seeds and our daily bread by strengthening Bija Swaraj and Anna Swaraj , and continuing the Bija Satyagraha.

The real owners of both the companies are the same people. This merger should be analysed from a this vantage point because the real owners of these companies - Monsanto, DuPont, Dow, etc are the same and now forming the biggest global monopoly ever created in the world. They are forging a new system of control that begins to extract profits from the seed, agrichemicals down to pharmaceuticals.

The case of the Bt Cotton in India is already good example of the criminality of this cartel. They have not only pushed over 300,000 farmers to suicide in since '95 by trapping them in debt through purchase of high cost seed and chemical inputs but are also responsible for the growing debt and agrarian crisis of India.

In October 2015, after the failure of Bt Cotton in Punjab, about Rs 70,0000 crore were the damages borne by the farmers and labourers, while Monsanto and Bayer both profited the sales of seeds and pesticides which failed to control the whitefly.

The cartel has even challenged the CCI and the Indian government, and still continues to work against Indian farmers for their profits.

Corporations like Monsanto, Bayer, Dow, Dupont, Syngenta, all have their roots in warfare and through free-trade neoliberal policies and deregulation of commerce, they enlarge their empire with mega buyouts. These hallowed corporations of today, that have been tried and tested for crimes against humanity in the post war years, continue to use the same poisons that kill, but under the guise of being saviors of humanity.

4. Control over food, health and Right to Life of Indian Citizens India and outstanding issues of liability for the Bhopal genocide

The merger between Dow/Dupont will not only provide the cartel with the complete control of our food and agriculture through the market, but will also set a bad precedent for India. Dow is liable for the murder of thousands of Indian citizens in Bhopal. They still evade judicial process and the justice for the citizens of Bhopal is still hung.

Dupont and Monsanto are now joining hands to combine resistance to Monsanto's Roundup and Dupont's Dicamba because supersedes arranging which are resistant to Roundup .

The new product, DuPont FeXapan herbicide plus VaporGrip Technology, will go with Monsanto's new Roundup Ready 2 Xtend soybeans which are genetically altered to resist dicamba and glyphosate.

Monsanto and DuPont Announce New Weed Killer for GMO Crops

<http://www.ecowatch.com/monsanto-dupont-weed-killer-gmo-crops-1910876805.html>

Monsanto has recently been caught introducing Round up resistant Bt cotton seeds illegally in total violation of India law .

The IARC of the World Health organisation warned that Roundup is a Carcinogen . Monsanto is trying to have the WHO expert group dismantled and has tried to buy scientists and regulators .

https://www.iarc.fr/en/media-centre/iarcnews/pdf/Reuters_questions_and_answers_Oct2016.pdf

http://www.huffingtonpost.com/carey-gillam/iarc-scientists-defend-gl_b_12720306.html

https://www.global2000.at/sites/global/files/Glyphosate_and_cancer_Buying_science_EN_0.pdf

More power of these corporations will make it impossible to have honest and independent scientific assessments of the impact of the hazardous products they sell , or protection of public health through regulation independent of their influence .

Monsanto illegally even introduced of herbicide tolerant GMO Round-up Ready Flex Bt cotton(RR Bt Cotton). Round up, a glyphosate based herbicide has been declared a "probable carcinogen" by the World Health Organisation (WHO). Sri Lanka had banned glyphosate after 40,000 reported deaths directly linked to the use of this herbicide and many European countries have also banned glyphosate.

After reports of contamination, farmers collected sample from different areas and sent them to the Central Institute for Cotton Research(CICR), and they confirmed the presence of round up ready(RR)

Bt cotton(report attached), which is not only illegal but a major hazard for the health of the Indian people.

As per the test results, bolls collected from six fields tested positive for Round up Ready flex. The RR Bt Cotton was packaged as Bollgard -2 and illegal.

Genetically modified crops do not have greater yield nor do they have greater nutrition. Those traits come from the plant that RoundUp Resistance and Bt-toxin traits are introduced into. All GM crops do is allow for unrestricted use of RoundUp rendering the soil dead, devastating biodiversity and causing death and diseases in plants, animals and human beings. It is not in the interest of Monsanto to feed the world or reduce the use of RoundUp. Monsanto has deceived the Indian farmers and government by illegally introducing RR Bt Cotton. They have transgressed all rules and regulations of the government.

In India, Monsanto's net sales of RoundUp for Financial Year 2013-14 were ₹208.89 crores, up by ₹69.86 crores (50%) over the Financial Year 2012-13 net sales of ₹139.03 crores. This increase, according to Monsanto is due to higher volumes. Reducing chemical use doesn't seem to be a priority for Monsanto.

<http://www.wiglafjournal.com/pricing/2012/06/monsanto-the-global-glyphosate-market-case-study/>

The Technical Expert Committee of the Supreme Court had also concluded that Herbicide tolerant crops should not be allowed in India because they kill all plants, and in a land of rich biodiversity ,they can destroy the food security and livelihood of small farmers. Herbicide resistant traits can also contaminate the crops of which India is a centre of Diversity.

This is the second time since '95 Monsanto has illegally introduced GMO cotton in India and destroyed Swadeshi cotton varieties with its toxic seeds. Navdanya filed case in the Supreme Court, to expose the Monsanto's illegal entry with Bt Cotton in India

The case was closed as Monsanto after lobbying with the Government got an approval for Bt 1 in India. Since it's legalisation in 2002, Monsanto has looted Rs 7000 crore from the poor Indian cotton farmers and is directly responsible for pushing Indian farmers into debt and suicide. Since '95, over 3,10,000 have committed suicide most of which are from the cotton belt of India.

Round up is Dangerous:

Cancer

As per the Lancet journal, Exposure to Glyphosate has been shown to cause tumours of the mammary glands in rats.The International Agency for Research on Cancer has linked Glyphosate exposure to cancer. RoundUp is many many times more toxic than Glyphosate alone.

[http://www.thelancet.com/journals/lanonc/article/PIIS1470-2045\(15\)70134-8/abstract](http://www.thelancet.com/journals/lanonc/article/PIIS1470-2045(15)70134-8/abstract)

KIDNEY FAILURE

On the island of Sri Lanka, 20,000 people have died due to kidney failure attributed to Glyphosate exposure. <http://www.lankabusinessonline.com/news/sri-lanka,-kidney-disease-linked-to-glyphosate,-phosphate->

BIRTH DEFECTS

<http://overgrowthesystem.com/argentina-the-country-that-monsanto-poisoned-photo-essay/>
Argentina has seen a rise in birth defects, cancers, kidney failures, infertility and various other diseases in an otherwise healthy people due to unchecked use of RoundUp.

RoundUp DAMAGES DNA

Minimal exposure by inhalation of Glyphosate - even at 450 times less concentration than that used for spraying- damages DNA in the cells.

<http://www.ncbi.nlm.nih.gov/pubmed/22331240>

<http://seedfreedom.info/make-monsanto-pay/>

Sustainable Agriculture healthy and safe food is the basis of a healthy life of citizens . Independent regulation to protect the public good is obligation of a sovereign country to its citizens . The right to food is the right to life (article 21 of the Indian constitution) .

Control over food and agriculture by the poison cartel and absolute unaccountable power over our food and agriculture system would not just just aggravate the difficulties the farmers and they will aggravate the health crisis and lead to spread of their toxic chemical.

We call on the Competition commission to keep in mind these vital dimensions of the impact of the merger on the freedoms of Indian farmers and Indian citizens according to the objective of the Competition Act which is “to protect the interests of consumers and to ensure freedom of trade carried on by other participants in markets, in India”

We hope you will use this information and act to keep Indians and India safe from the cartel and prevent the creation of mega global monopoly between DuPont and Dow.

Regards,

Dr Vandana Shiva
Founder-Director
Navdanya

