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**Sent:** 7/28/2018 12:13:46 AM  
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**Subject:** Oxitec Brazil Closes Planet, Same issues as Cayman  
**Attachments:** Oxitec closes factory and exposes failure of the creation of the transgenic mosquito.pdf

Hi All,

Dr Norris and I brought a lot of evidence about Oxitec credibility, professional practice and the safety and viability of their GM Species technology. The article in the link, also translated and attached in pdf, affirms the same issues as seen in the Cayman trials, exposed in Dr Alan Wheeler's FOIA released emails. Please note some of the translation may be slightly awkward.

<https://www.redebrasilatual.com.br/saude/2018/07/oxitec-fecha-fabrica-e-expoe-fracasso-da-criacao-de-mosquito-transgenico>

The inordinate amount of females released are promoting hybridized wild *Aedes Aegypti* populations without characterization, or long term studies. Mohamad Habib the entomologist from Brazil CTNBio said in the article that "in terms of controlling the population of *Aedes aegypti* wild , and Oxitec as a criminal for deceiving managers and the population and made them guinea pigs." He also highlighted the risks to health and the environment associated with the release of millions of insects altered by genetic engineering. "This increases the number of crosses and can generate new strains, with impacts still unknown to biodiversity, and increase population, virus circulation and the consequent contagion of diseases, not to mention that the adoption of the mosquito can discourage managers and own population in actions to combat the breeding of these insects, a problem that should be faced by the Public Ministry and the authorities. "

This article goes on to explain some of his reasoning for the failure:

According to the data, while the Oxitec speaks in reduction of 90% of the population of wild *Aedes* , the program shows much smaller number, 60%. One reason is the large number of females that are out of control and loose in the environment - hence the reason the company invests in the second generation technology, with a focus on females.

The large number of females released means that humans in any test area become part of an experiment for a mosquito bite that has not been clinically tested on humans, or animals. The Common Rule must be applied and permit those within a test area to have informed consent to any trial. The recent exposure of allergen relationships that Oxitec has not disclosed, should be a high level concern. They either are not aware, or are. Either way, they have not discussed any results. They put in the EUP application that 1/4300 mosquitoes would be female, but they have struggled to make 1/500 in the Cayman trial and it seems the same is true in

Brazil. How can a purposefully erroneous application be approved? They were accosted by the Cayman MCRU about the quantities of females being released approximately 1 month before submitting the application to the EPA. This is willfully misleading!

Oxitec has abandoned the camp of science and pitched their tent in the marketing camp. They wish to release this experiment on the US for the sake of their profit and it is not ready for release if human and environmental safety are to be assured!

One of the hardest challenge for the EPA, or any of our regulatory agencies, moving forward in the wake of rapidly advancing technology, is to clearly define the scientific rigor required to assure safety, while dealing with brilliant people who would deceive in order to profit.

We have all of the compelling evidence to show the concerns surrounding this technology represent unnecessary levels risk to our population and ecosystems. Oxitec does not care to provide the necessary evidence to demonstrate safety, they only care to deliver a brilliant dialogue on what they have done, in hopes that it will dupe our EPA into believe Oxitec is competent, when all of the data coming from the field shows they are not!

Add all of this together with the likelihood that this technology can amplify antibiotic resistant bacteria, as Dr Norris has shown, and there can be no assurance of safety to our public, or ecosystems. We urge the EPA deny the Oxitec EUP for this GM Species, the OX513A, and any other GM Species developed by Oxitec, whether regulated under USDA, or FDA, should be immediately suspended from release, until safety can be assured.

Sincerely,

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