



**CENTRE FOR CLIMATE  
CHANGE & FOOD SECURITY  
(CCCFS)**

Head Office: Kumasi – Ghana W/ Africa.

Motto: Healthy Environment,  
Nutritious food & Healthy people

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CCCFS

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Food Security

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**THE CHIEF EXECUTIVE OFFICER  
NATIONAL BIOSAFETY AUTHORITY  
P. O. BOX WY 669  
KWABENYA, ACCRA  
GHANA**

**23<sup>rd</sup> March, 2022**

Dear Sir,

**RE: APPLICATION TO APPROVE GENETICALLY MODIFIED CROP – THE POD BORER-  
RESISTANT COWPEA**

1. Please accept the compliments of CCCFS.
2. CCCFS hereby submits our position in response to your gazette notice on the above-styled subject in accordance with section 19 of Biosafety (Management of Biotechnology) Regulations 2019 (L.I. 2383).
3. Before we proceed to state our position on the instant issue, we want to register our reservation about the mode of informing the public on this important matter by your outfit. It appears the process of public engagement has not been well advertised, thereby, casting a thick shadow of doubt on the whole process. While we acknowledge the injunctions of the regulatory L.I., we expected that much more would be done to extensively carry the public along.
4. CCCFS, as a sustainability-oriented organisation, is fundamentally opposed to the introduction of GMOs into Ghana's cropping/agricultural system especially under circumstances that are not well justified, and the current application before you, is no exception.
5. At the risk of sounding repetitive, we want you to avert your mind to the fact that, scientists across the world are differed on the implications of GMOs on the environment and biological life. Please refer to this peer-reviewed journal (<https://enveurope.springeropen.com/articles/10.1186/s12302-014-0034-1>) which highlights the points about scientific controversies.
6. In the light of point 5 above, we ask the NBA to be extremely cautious in granting clearance for the environmental release of the GM cowpeas. Obeisance to the tenets of the precautionary principle, in our opinion, is preferred under the circumstance.

**Subsidiaries:**

**Feeding Ghana, Food for Africa, Aspiring Young Africa Farmers.**

7. Further, we find it very curious, that, the NBA expects opinions from the public, while important data that could underlie any such opinion, are not available. Based on this, CCCFS would like to make the following requests:

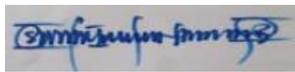
- a. we want to be given access to the data (including, but not limited to; environmental and biological) generated by the applicants during their trials and the justification for the application.
- b. what mechanism does NBA intend to use in assessing the propriety of granting the request of the applicants? Here, we would like to request for a detailed experimental plan by the NBA.
- c. consequent to (b), we would like to request for the results of NBA's assessment whenever same is ready.

8. Our informed opinion would be hinged on the requests under point 7 above. We therefore ask you to consider this as our preliminary objection in accordance with our organisation's policy.

9. To reiterate point 4, we are making a request for the NBA to intensify its public advocacy through the media, conferences, etc to allow the public to get involved in the process.

10. Please accept our assurances of the highest order and we look forward to hearing from you soon.

Yours sincerely,

A rectangular box containing a handwritten signature in blue ink. The signature appears to be 'Sulemana Issifu'.

Sulemana Issifu  
Director of Research