



Overview of Oxalate Oxidase Peanut Risk Assessment



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Background

The EPA Office of Pesticides regulates the sale, distribution, and use of all **pesticides** in the U.S. in order to protect human health and the environment.

Including: GE Plant-Incorporated Protectants (PIPs), such as the *Sclerotinia* resistant peanut

Coordinated Regulation

- **U.S. Department of Agriculture**
 - Evaluate potential risks to agriculture and the environment.
- **U.S. Food and Drug Administration**
 - Food and feed safety
- **U.S. Environmental Protection Agency**
 - For GE plants that produce pesticides, EPA evaluates human and animal health and environmental risks, and sets food tolerance levels for all pesticides



Sclerotinia on Peanut





***Sclerotinia* in Peanuts**

- ***Sclerotinia minor* infects peanuts (*Arachis hypogaea*) and other dicots**
 - Pathogen is necrotroph and produces oxalic acid as pathogenicity factor
- **Typically not a disease of cereals**
- **Oxalate oxidase is in the germin family (cupin superfamily)**
- **OxOx provides protection from disease**



EPA Regulation of PIPs

- EPA regulates the gene and its product
- Inert ingredients are also considered
- EPA does not regulate the plant itself
- Regulation continues as long as the product is in commerce (**licensing**)
- Food / feed safety and environmental assessments are performed for all PIPs



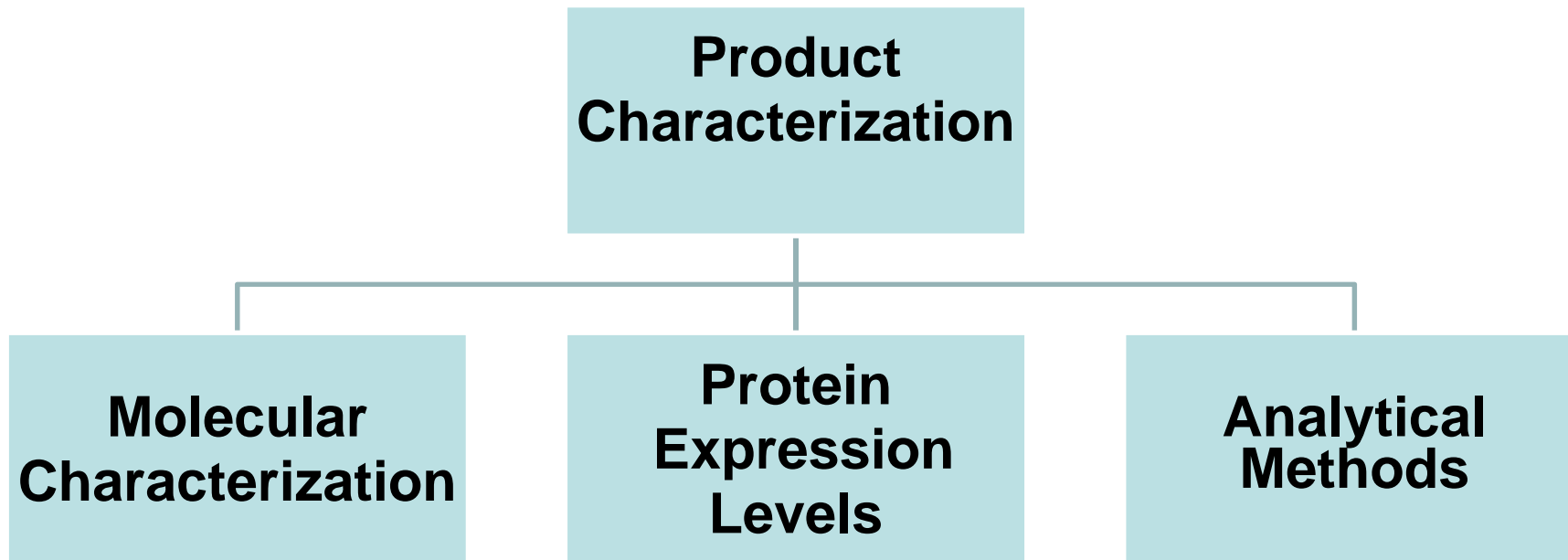
Risk Assessment Process

Risk = Hazard x Exposure



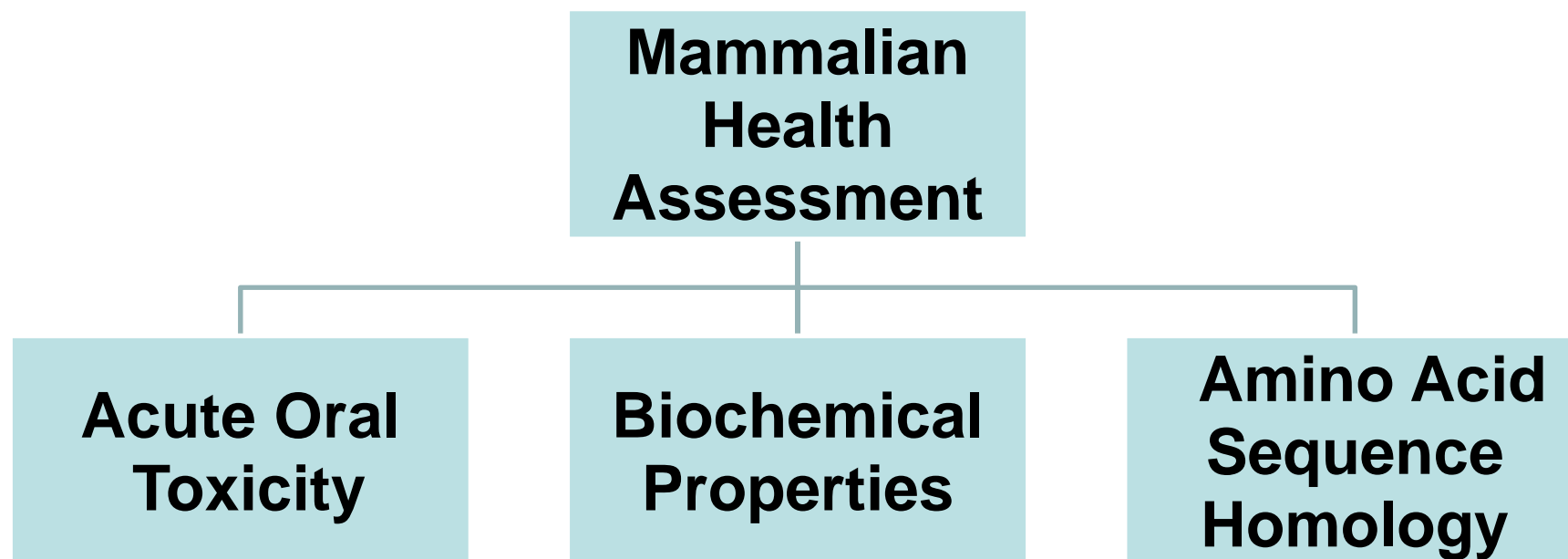


How EPA characterizes PIPs





How EPA Assesses Mammalian Dietary Effects for PIPs





***Sclerotinia* Blight Resistant Peanut**

- ***Arachis hypogaeae***
- **DNA sequences from oxox gene of barley**
- **Particle bombardment transformation**
- **Toxin inactivation mechanism**
- **Toxicity endpoint addressed if in food**
- **Cupin family contains allergens**
- **Germination/defense expression**



OxOx Peanut

- **No detailed formal submission**
- **Active- promoter + OxOx gene + terminator**
- **Marker – resistance gene**
- **Insert number not definitive**
- **Last conversation indicated still in screening process for final selections based on field performance.**

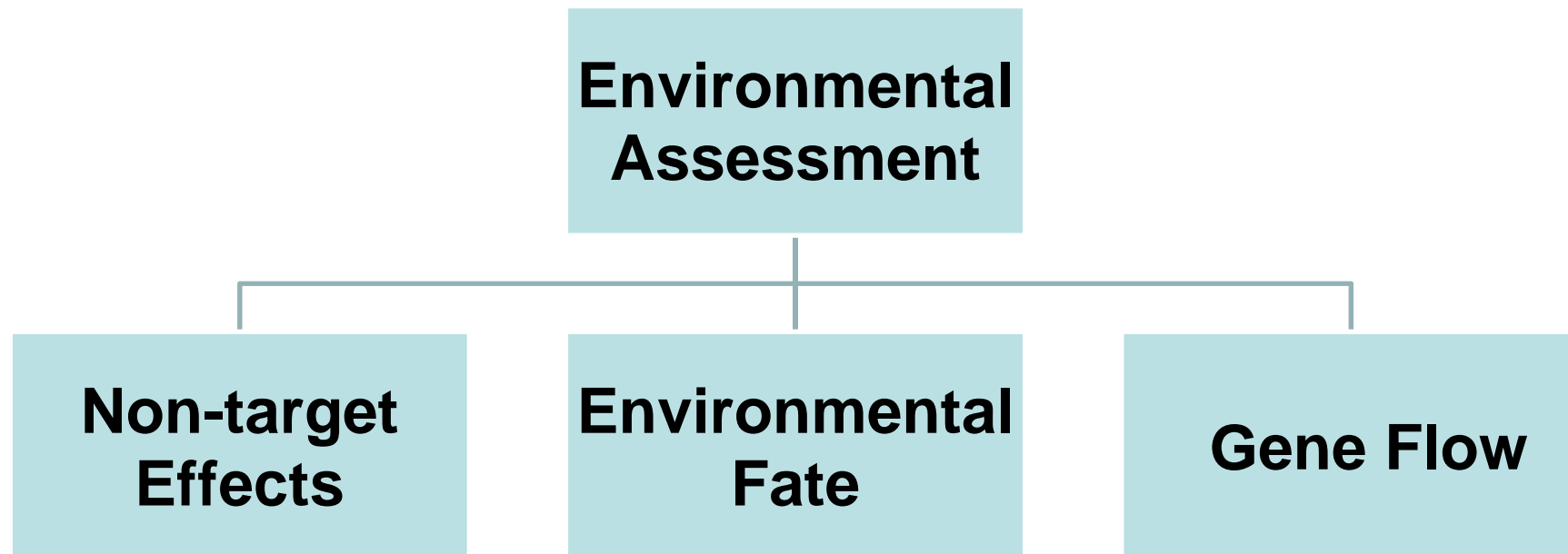


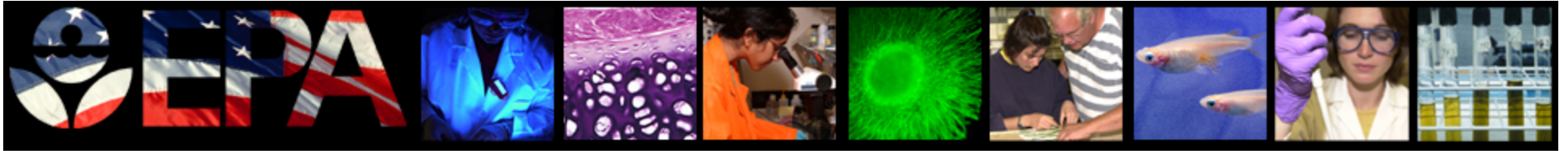
Regulatory Considerations

- Trait with history of consumption and exposure
- Protein has no homology with known toxins or allergens –but protein family with allergens
- Food tolerance exemption for DNA and marker protein
- No information on OxOx stability to proteases, heat or environmental factors
- No initial cross pollination issues based upon primarily self pollinating



How EPA Assesses Environmental Effects for PIPs





Environmental Assessment

- **Wild mammal toxicity**
- **Aquatic invertebrate toxicity**
- **Freshwater fish toxicity**
- **Non-target arthropod toxicity**
- **Honeybee toxicity**
- **Estuarine / Marine organism toxicity**
- **Microbial community testing**



Regulatory Considerations

- **No initial gene flow issues based upon ploidy differences with native species but not confirmed**
- **No information on OxOx stability to proteases or environmental factors**
- **No information on possible effect on microbial cycling processes**



Useful websites

- <http://www.epa.gov/oppbppd1/biopesticides/pips/index.htm>
- http://www.epa.gov/pesticides/biopesticides/reg_of_biotech/eparegofbiotech.htm