



# An assessment of the risk of Bt-cowpea to non-target organisms in West Africa

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## Abstract

Cowpea (*Vigna unguiculata* Walp.) is the most economically important legume crop in arid regions of sub-Saharan Africa. Cowpea is grown primarily by subsistence farmers who consume the leaves, pods and grain on farm or sell grain in local markets. Processed cowpea foods such as *akara* (a deep-fat fried fritter) are popular in the rapidly expanding urban areas. Demand far exceeds production due, in part, to a variety of insect pests including, in particular, the lepidopteran legume pod borer (LPB) *Maruca vitrata*. Genetically engineered Bt-cowpea, based on *cry1Ab* (Event 709) and *cry2Ab* transgenes, is being developed for use in sub-Saharan Africa to address losses from the LBP. Before environmental release of transgenic cowpeas, the Bt Cry proteins they express need to be assessed for potential effects on non-target organisms, particularly arthropods. Presented here is an assessment of the potential effects of those Cry proteins expressed in cowpea for control of LPB. Based on the history of safe use of Bt proteins, as well as the fauna associated with cultivated and wild cowpea in sub-Saharan Africa results indicate negligible effects on non-target organisms.

**Keywords** Cowpea · *Maruca vitrata* · Bt-cowpea · Non-target organisms · West Africa · Environmental risk · Assessment · Arthropod fauna

## Key messages

- Data on the environmental safety of *Bacillus thuringiensis* (*Bt*) Cry proteins, especially toward non-target arthropods, are available for many genetically modified crops but not in the context of cowpea.
- Before environmental release of Bt-cowpea for control of the legume pod borer, a major insect pest attacking cowpea, the potential effects on non-target organisms (NTO), particularly arthropods, need to be assessed.
- An assessment of the *Bt* Cry proteins, their history of safe use, as well as the fauna associated with cultivated and wild cowpea in sub-Saharan Africa indicates negligible effects on non-target organisms.

## Introduction

Cowpea (*Vigna unguiculata* Walp.) is the most economically important legume crop in West Africa (Langyintuo et al. 2003). Nigeria, Niger and nations surrounding these two countries are the most productive cowpea lands globally,

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and Africa accounts for over 95% of the world production (FAOSTAT 2017). In much of West Africa, cowpea grains constitute the major source of protein and for this reason are regarded widely as “poor man’s meat” especially in remote rural areas (Murdock et al. 2008). In fact, most of the cowpea grain is consumed at home or sold in local markets. Some of it is traded into neighboring countries to the south, which it reaches following an ancient trading network leading to the now burgeoning coastal cities. Cowpea suffers from a number of different biotic constraints, but insect pests inflict the most substantial losses (Murdock et al. 2008). Low-resource farmers face a pest control paradox: cowpea growers typically (1) do not have a supply of quality insecticides, (2) nor pesticide sprayers, (3) nor the money to buy required quantities, (4) nor the know-how to use them safely and efficiently (Murdock et al. 2008). When farmers do have resources, it is common to spray cowpea up to four times a season for effective control (Murdock et al. 2008). Across Africa the use of pesticides is increasing rapidly. Unfortunately, pesticides are frequently mislabeled, fraudulent or use chemistries that are either deregistered or banned in more progressive countries (Jepson et al. 2014; Donald et al. 2016). All these factors make it difficult for farmers to safely and effectively control the pest with yields as low as one-tenth of the yield potential (Murdock et al. 2008). The impoverished cowpea farmers of Africa, a great many of whom are women, stand empty handed and largely helpless against the ravenous insects that take their crop. Traditional breeding/screening research to bring needed insect resistance into cowpea cultivars suitable for the region has had little success against the major insect pests of cowpea, especially for the legume pod borer (LPB), *Maruca vitrata* Fabricius (Lepidoptera, Crambidae) (Murdock et al. 2008). However, Bt  $\delta$ -endotoxins (Cry proteins) of the soil bacterium *Bacillus thuringiensis* (Bt) subsp. *kurstaki* are highly toxic against *M. vitrata* early-instar larvae (Srinivasan 2008). A major advance in the management of LPB has been achieved by engineering cowpea to encode genes that express a Cry1Ab delta endotoxin of *B. thuringiensis* (Popelka et al. 2006). Multiyear Confined Field Trials (CFT) in Burkina Faso, Ghana and Nigeria show that genetically engineered (GE) Bt-cowpea plants encoding a Cry1Ab protein are immune to LPB (Addae et al. 2007, Submitted). Once released to farmers, Bt-cowpea should protect cowpea from yield loss resulting from LPB feeding.

Despite its promise and the acute need for Bt-cowpea, there are many hurdles to its adoption. Before GE Bt-cowpea can be released to African farmers, it must receive regulatory approval from the African regulatory authorities in countries where it will be grown (Huesing et al. 2011). In addition, a seed system is currently being developed for sustainable production of high-quality Bt-cowpea seed including a quality management system that can ensure the technology meets international Stewardship guidelines ([http://](http://www.excellencethroughstewardship.org/)

[www.excellencethroughstewardship.org/](http://www.excellencethroughstewardship.org/)). For regulatory approval, Bt-cowpea will undergo a rigorous environmental risk assessment (ERA) process. In part, the ERA will estimate the probability of a harmful effect to non-target organisms or to the environment that might result from the deployment of Bt-cowpea in farmers’ fields in sub-Saharan Africa.

The ERA of all GE plants, including Bt-cowpea, does not focus on generating new scientific knowledge but instead serves as an aid to decision making (Hill and Sendashonga 2003; Romeis et al. 2009). The ERA process is designed to answer very specific, relevant and realistic questions about the potential risks of introducing Bt-cowpea plants into the African environment (Romeis et al. 2008, 2011; Raybould 2010). Requirements for new assessment data are limited to those necessary to reach a confident conclusion of acceptable risk. If suitable data on which to base a regulatory decision are already available, they can and should be used to inform the risk assessment. Requests for additional data merely to answer interesting scientific questions should be avoided (Raybould 2007b). In other words, risk assessments should be based on “need to know” not “nice to know” data.

A potential environmental risk from a GE insect-resistant crop is that desirable organisms, primarily arthropods (often referred to by the general term “non-target organism” or NTO), will be harmed by exposure to the insecticidal protein. A useful approach to framing the ERA is the formation of an “Expert Panel” to assess available data and identify data gaps prior to initiation of the formal risk assessment. In that light, a Bt-cowpea expert panel was convened in 2009 which addressed six specific questions associated with the potential environmental risk of Bt-cowpea to NTOs (Huesing et al. 2011). Briefly, the panel determined that for NTOs exposed to Cry1Ab and Cry2Ab<sup>1</sup> in cowpea the current safety data and history of safe use of Cry1A and Cry2 class proteins provide important NTO safety data for Bt-cowpea expressing Cry1Ab. The panel also determined that the currently known expression profile of Cry1Ab in cowpea effectively removes some NTO groups from consideration since these organisms would have limited or no exposure to Cry1Ab. The panel also outlined the data likely needed to support the familiarity component of the registration package including field assessments of select NTOs collected in the product development and regulatory registration phases. A key outcome of the expert panel and the subject of the present paper is the assessment of potential effects on non-target organisms given the likelihood of gene flow from conventional to wild cowpea. The expert panel

<sup>1</sup> This review also considers the use of Cry2Ab, where appropriate, because a second-generation Bt-cowpea is under development which will use a *cry2Ab* gene for insect resistance management.

recommended further assessment of published papers and institutional reports as well as field survey work to determine whether any unique species might be exposed and harmed by Cry1Ab or Cry2Ab proteins in wild cowpea.

## Potential uses of Bt-cowpea

Widespread deployment of Bt-cowpea in the heart of the cowpea-growing area of sub-Saharan Africa has the potential to significantly increase grain yields without increasing insecticide use on the crop; indeed, it will result in less insecticide use while protecting against yield losses. The magnitude of the protection will vary with the location and the degree of LPB pressure in any particular year. Estimates of losses to LPB vary but are always substantial. In Taiwan, for example, Liao and Lin (2000) estimated losses to LPB to be 17–53% based on increased pod yields after insecticide treatment. Likewise, in West Africa LPB caused yield losses of 25–80%, although it is difficult to isolate specific losses due to *M. vitrata* from losses caused by other insects like thrips and pod-sucking bugs (Singh et al. 1990; Echemdu and Akingbohunge 1990). Increasing cowpea yields will bring benefits to both producers and consumers in the cowpea-growing and cowpea-consuming nations making up the Nigerian grain shed (Langyintuo and Lowenberg-DeBoer 2006). Long-term deployment of Bt-cowpea will increase yields while lowering the market price of the grain (Langyintuo and Lowenberg-DeBoer 2006). For growers, the lowered market price will be compensated by higher yields. Relative shares of the benefits for producers and consumers will vary with location and whether the country is a net cowpea importer or exporter (Langyintuo and Lowenberg-DeBoer 2006). The overall benefit will include a greater and more stable supply of cowpea grain for consumers, increased incomes for farmers and reduced exposure of growers, consumers and the environment to insecticides.

## The Bt-Cowpea arthropod food web

To evaluate which natural enemies might be exposed to insecticidal proteins and may be at risk in GE cowpea fields in Africa, an arthropod food web was compiled to identify and prioritize non-target organisms (NTO; primarily arthropods) for risk assessment using the approach similar to that described by Romeis et al. (2009, 2014a, b), and Li et al. (2017). The basis for the food web was peer-reviewed literature retrieved from the Purdue University Library (West Lafayette, Indiana, USA) and the ISI Web of Science. Rare books and unpublished reports were obtained from the library of the International Institute of Tropical Agriculture, IITA, at Ibadan in Nigeria. IITA is the sole CGIAR

center with a global mandate for research on cowpea. Our primary focuses were those arthropods routinely reported in the literature.

## The target pest of Bt-cowpea: *Maruca vitrata* F

### Distribution

The legume pod borer, *M. vitrata* (Syn *Maruca testulalis*), is a pest of grain legumes in the tropics and subtropics (Taylor 1967; Raheja 1974). The wider distribution of this insect extends from the Cape Verde Islands in West Africa to Fiji and the Samoa Islands in the Far East including Australia and Southeast Asia. The pest has also been reported in the West Indies and Americas. It has never been recorded in Europe or in the Mediterranean basin. The geographic origin of *M. vitrata* is controversial. Molecular analyses suggest different subspecies of *M. vitrata* worldwide (Margam et al. 2011a, b, c) with additional subpopulations in West Africa (Margam et al. 2011b; Agunbiade et al. 2012), although the most recent study confirms a possible Southeast Asian origin (Periasamy et al. 2015).

### Biology and ecology

The complete life cycle of LPB requires from 22 to 25 days (Singh and Jackai 1988) depending on the temperature. Adults emerge throughout the day, but the greatest emergence occurs at night (Huang and Peng 2001; Lu et al. 2007). Emergence of both sexes is almost synchronous, and the sex ratio is 1:1. Adult *M. vitrata* are nocturnal (Lu et al. 2007), and the mating frequency peaks in 3-day-old females (Huang and Peng 2001; Lu et al. 2007). Females prefer high humidity (> 80%) and moderate temperatures (20 to 24 °C) for mating. Females typically only mate once (Atachi and Gnanvossou 1989), while males may have multiple matings (Jackai et al. 1990). The gravid female oviposits preferably on flower buds, but the eggs may be deposited singly or in batches of 2–6 on vegetative buds, on flowers and sometimes on leaf axils (Bruner 1930; Wolcott 1933; Krishnamurthy 1936; Taylor 1967, 1978). A single female may lay 200 to 800 eggs within 3 to 14 days depending on environmental conditions (Taylor 1967, 1978; Akinfenwa 1975; Huang and Peng 2001; Chi et al. 2005; Naveen et al. 2009). Hatching occurs 3 to 5 days after eggs are laid and young larvae feed on the tender parts of stems, peduncles, flowers, flower buds and young pods (Singh and Jackai 1988; Atachi and Gnanvossou 1989), but infestation is more prevalent in flowers (Chi et al. 2003). Larvae are nocturnal (Usua and Singh 1979), typically feed inside of the cleistogamous cowpea flower where they are protected from environmental stressors, and move from one flower to another as they grow. Each larva may consume 4–6 flowers

before larval development is completed (Gblagada 1982). Larvae of *M. vitrata* are dispersed randomly on the flowers of a cowpea plant (Firempong and Mangalit 1990). Third- to fifth-instar larvae are capable of boring into the pods, where they are protected from environmental stressors, and occasionally into the peduncle and stems (Taylor 1967). There are five larval stages, and larval development is completed within 8 to 14 days depending on the environmental conditions (Singh and Allen 1980; Okeyo-Owuor and Ochieng 1981; Singh and Jackai 1985). There is a pre-pupal stage of 1–2 days (Taylor 1978). Pupation occurs in a silken cocoon attached to the plant or inside the pods and lasts 5–14 days (Ochieng et al. 1981; Singh and Jackai 1985). *M. vitrata* does not undergo diapause, and populations of the insect during the off season are maintained on a wide range of host plants (Okeyo-Owuor and Ochieng 1981) including 23 species of Fabaceae in Benin (Arodokoun et al. 2003) and 13 species in western Burkina Faso (Traore et al. 2014). Three to four generations of *M. vitrata* can occur on cowpea annually with additional generations surviving on alternative host plants particularly in the humid southern part of its range (Adati et al. 2012).

The availability of alternative hosts and thus the survival of *M. vitrata* populations vary along a south–north gradient. In the humid and moist tropical south host plants are abundant year-round and *M. vitrata* is endemic. Endemic *M. vitrata* emigrates from this humid zone to cowpea-cropping areas in the north following the intertropical convergence zone. In the arid northern Sahelian Savanna, where the dry season typically lasts 7 to 8 months, the number of alternative hosts diminishes rapidly and *M. vitrata* occurs only as a seasonal migratory pest during the rainy season and generally becomes locally extinct (Bottenberg et al. 1997; Ba et al. 2009; Margam et al. 2011a, b; Onstad et al. 2012). There is a middle zone between the humid south and the arid north where a patchwork of *M. vitrata* populations exist on alternative hosts plants, especially along rivers. This is consistent with data reported in northern Nigeria (Bottenberg et al. 1997) and in Burkina Faso (Ba et al. 2009; Margam et al. 2011a, b, c; Traore et al. 2014).

### Crop damage

*M. vitrata* is a key cowpea pest because the larvae feed on the tender parts of the stem, peduncles, flower buds, flowers and pods (Singh and Jackai 1988). The extent of losses to *M. vitrata* is difficult to assess since several other insects also feed on cowpea. However, damage to a single flower can lead to the loss of one potential pod. Larval density of one *M. vitrata* larva per flower is enough to cause significant yield losses, and a single larva may consume around five flowers during development to adulthood (Atachi and Aho-huendo 1989). Yield losses range from 25 to 80% depending

on the agro-ecological region, prevailing climatic conditions and cowpea variety (Echendu and Akingbohunge 1990; Singh et al. 1990).

### Non-target arthropod pests of cowpea

Cowpea is attacked by numerous insect pests during all stages of its growth and development. Insect pests include species from the following orders: Lepidoptera, Hemiptera, Coleoptera and Thysanoptera (Singh et al. 1990). The Cry1Ab and Cry2Ab proteins expressed in Bt-cowpea specifically target lepidopteran pests (CERA 2011, 2013; OECD 2007). Accordingly, they are not expected to affect other non-lepidopteran pests such as thrips, pod-sucking bugs and aphids.

#### Lepidoptera species

In addition to *M. vitrata* several other lepidopteran species have been observed on cowpea. These include the cowpea seed moth *Cydia ptychora* Meyrick (Lepidoptera: Tortricidae), the hairy caterpillar *Amsacta moorei* Butler (Lepidoptera: Noct.), the cotton bollworm *Helicoverpa armigera* Hübner (Lepidoptera: Noct.) and *Spodoptera* spp. (Lepidoptera: Noctuidea) (Jackai and Daoust 1986; Singh and Van Emden 1979) including the newly introduced invasive species, *Spodoptera frugiperda*, the Fall Armyworm (Meagher et al. 2004). There have been no reports of feeding by any known charismatic lepidopteran pests (<http://biologie.ens-lyon.fr/ressources/bibliographies/m1-11-12-biosci-reviews-ducarme-f-1c-m.xml>). Like *M. vitrata*, *C. ptychora* also feed on cowpea floral parts and pods, but in addition it also feeds on leaf buds (Olaifa and Akingbohunge 1981). In Senegal, *A. moorei* occasionally causes serious damage on cowpea (Ndoye 1978; Bal 1991), while across Africa, *H. armigera* and *Spodoptera* spp. are minor or sporadic pests on cowpea (Jackai and Adalla 1997). *A. moorei* feeds only on cowpea leaves, but *H. armigera* and *Spodoptera* spp. feed on leaves and pods (Jackai and Daoust 1986). In northern Nigeria, lycaenids are found feeding on cowpea year-round but are most common in the dry season unlike *M. vitrata*, which is primarily a wet season pest. Lycaenid infestations rarely have a measurable effect on cowpea yield (Bottenberg et al. 1997).

#### Thysanoptera species

Thrips are among the most widespread insect pests of cowpea in West Africa. Several thrips species have been reported on cowpea, including the legume foliage thrips, *Hydatothrips adolfriderici* Karny, *Frankliniella schultzei* Moulton and *Megalurothrips sjostedti* Trybom (Okwakpam and Youdeowei 1980; Ezueh 1981; Jackai and Daoust 1986;



Bottenberg et al. 1998). Among these three species, *M. sjostedti* is the only species that seriously threatens cowpea production in Africa (Salifu 1992; Tamò et al. 1993a). Damage is caused by the nymphs, which feed on the flower buds and the flowers leading to necrosis and abscission (Tamò et al. 1993b). Severely infested plants do not produce any flowers, and yield losses ranging between 20 and 100% have been reported (Singh and Allen 1980).

### Hemiptera species

**Aphididae and Cicadellidae** Aphids and Cicadellidae are the only homopteran species encountered on cowpea in West Africa. The aphid *Aphis craccivora* K. is a widespread insect pest of cowpea in West Africa (Singh and Van Emdem 1979; Ofuya 1987; Bottenberg et al. 1998) occurring after a period of drought. It damages the plant by sucking phloem sap and transmitting viral diseases (Jackai and Daoust 1986). The insect feeds on young leaves, stems, terminal shoots and petioles of seedlings and, as the plants mature, moves to pods and flowers (Jackai and Daoust 1986; Ofuya 1989). Heavy feeding causes the stunting of the plants leading to leaf distortion, premature defoliation and death of seedlings (Singh and Allen 1980). Heavy infestation can seriously affect yield (Ofuya 1989).

*Empoasca* sp. are the most common species of leafhoppers encountered on cowpea (Parh and Taylor 1981). However, it is a minor pest of cowpea in West Africa (Singh and Van Emden 1979; Jackai and Daoust 1986; Bottenberg et al. 1998).

**Heteroptera species** In West Africa, cowpea pods suffer damage by a complex of Heteropteran species, commonly known as pod-sucking bugs (PSBs). Among these are, *Aspavia* spp., *Nezara viridula* L., *Riptortus dentipes* Fab., *Anoplocnemis curvipes* Fab., *Mirperus jaculus* Thun. and *Clavigralla tomentosicollis* Stål. Among the complex of PSBs, *C. tomentosicollis* constitutes 80% of the heteropteran populations in Nigeria and Burkina Faso (Suh et al. 1986; Dabire 2001). Adults and nymphs suck the sap from developing pods and seeds and cause premature drying and abscission of pods, seed malformation or total seed abortion. Grain yield losses may reach 60–100% in the absence of an effective control measures (Singh and Jackai 1985).

### Coleoptera species

Several coleopterans feed on cowpea including the leaf beetle, *Ootheca* sp and blister beetles, *Mylabris* sp. The leaf beetle damage is done by the adults which feed between veins of the leaves. Dense populations can totally defoliate cowpea seedlings, resulting in the death of the plant. The blister beetles feed on cowpea flowers. Beetles are minor pests of

cowpea in Africa, and the damage caused by direct feeding is insignificant unless their populations are extremely high (Singh and Jackai 1985).

The cowpea seed beetle, *Callosobruchus maculatus*, is the principal post-harvest pest of cowpea. Damage occurs to seeds during storage. The unprotected seeds can be completely destroyed after six months of storage (Ouedraogo et al. 1996). Infestations start in the field when the pods are maturing (Huignard et al. 1985; Sanon et al. 2005).

## The beneficial arthropod fauna: predators, parasitoids and bees

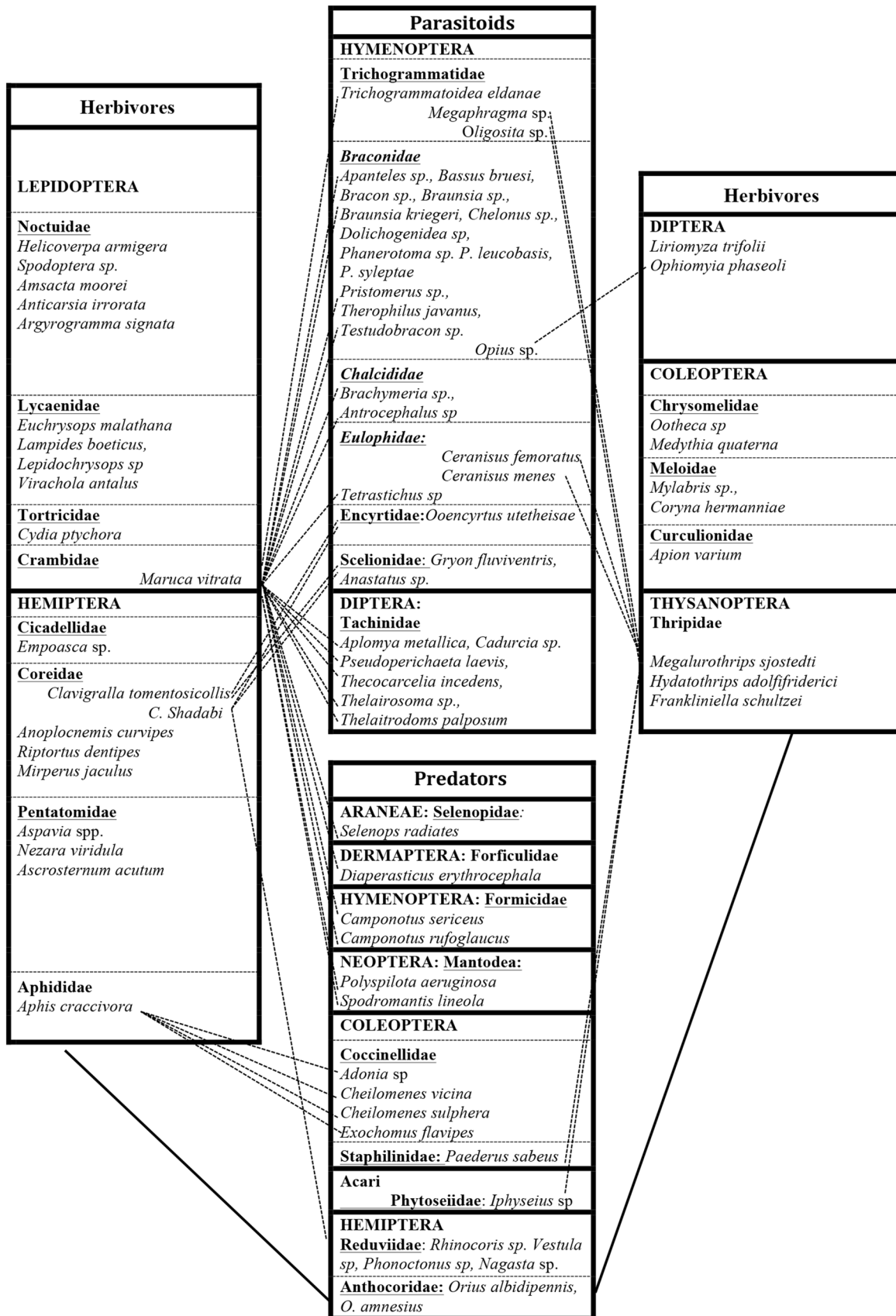
### Natural enemies of cowpea insect pests (predators and parasitoids)

As in all cropping systems there are a variety of parasitoids and predators that attack cowpea pests (Fig. 1). Hymenopteran parasitoids that attack thrips eggs and/or larvae include species from the Eulophidae and Trichogrammatidae families (Tamò et al. 1993b; Adati et al. 2007; Tamò et al. 2012). Thrips predators include mites from the Phytoseiidae family as well as beetles from the Coccinellidae and Staphylinidae families. Hemipteran predators include mainly *Orius* sp. (Tamò et al. 1993b; Bottenberg et al. 1998; Adati et al. 2007).

Several dipteran parasitoid species from the family Tachinidae attack *M. vitrata* larvae (Agyen-Sampong 1978; Usua and Singh 1979; Okeyo-Owuor et al. 1991; Arodokoun et al. 2006; Adati et al. 2007). In addition, larval parasitoids from the hymenopteran family Braconidae are prevalent (Taylor 1967; Agyen-Sampong 1978; Usua and Singh 1979; Okeyo-Owuor et al. 1991; Arodokoun et al. 2006; Adati et al. 2007). Two braconids from Southeast Asia are currently being evaluated for their biological control potential against *M. vitrata* in West Africa (Tamò et al. 2016). Hymenoptera pupal (Chalcididae), larval (Eulophidae) and egg (Trichogrammatidae) parasitoids have also been observed (Usua and Singh 1979; Okeyo-Owuor et al. 1991; Arodokoun et al. 2006; Adati et al. 2007). Predators that feed on larval and adult *M. vitrata* include spiders (Selenopidae), ants (Formicidae) and mantids (Mantidae) (Usua and Singh 1979; Adati et al. 2007). The hymenopteran parasitoid *Gryon fulviventris* (Scelionidae) is the only beneficial recorded that attacks the pod bug *Clavigralla tomentosicollis* (Asante et al. 2000; Adati et al. 2007).

### Cowpea floral bees

In West Africa, several bees forage on cowpea flowers including honey bees *Apis mellifera adonsonii* (Fatokoun and Ng 2007; Fohouo et al. 2009; Ige et al. 2011). In addition, carpenter bees, *Xylocopa* sp, digger bees, *Anthophora*



◀**Fig. 1** Web food table of herbivores that feed upon cowpea in West Africa (Adati et al. 2007; Bottenberg et al. 1998; Jackai and Daoust 1986; Singh and Allen 1980; Singh and Van Emden 1979; Dreyer 1994)

sp., bumble bees, *Bombus* sp. leaf-cutting bees, *Megachile* sp. have been reported in West Africa (Pasquet et al. 2007; Asiwe 2009a, b; Fohouo et al. 2009).

### Insect pests of wild cowpea

Wild *Vigna* species have been extensively monitored in West Africa for occurrence of cultivated cowpea insect pests (Taylor 1967; Atachi and Djihou 1994; Arodokoun et al. 2003). Most of the wild cowpea species, *Vigna racemosa*, *Vigna vexillata*, and *V. unguiculata* subspecies *spontanea* (formerly *dekindtiana*) host *M. vitrata* and flower thrips, *Megalurothrips sjostedti* (Jackai et al. 1996; Bottenberg et al. 1998; Arodokoun et al. 2003). Among the *Vigna* species, some are known to be highly resistant to *M. vitrata* (Jackai et al. 1996) thanks to both antixenosis and antibiosis mechanisms. Importantly, since the wild *V. unguiculata* subspecies *spontanea* (formerly *dekindtiana*) is the only subspecies that can interbreed with cultivated cowpea (Fatokoun 2002; Kouadio et al. 2007), the wild species *V. racemosa* and *V. vexillata* need not be considered further in the risk assessment.

### Assessing potentially harmful non-target effects of Bt-cowpea

Before commercial deployment of an insecticidal GE crop can begin, an environmental risk assessment (ERA) is conducted to determine the level of risk to non-target organisms (NTO) (Huesing et al. 2011). NTOs include non-target beneficial arthropods and threatened and endangered animals (Mendelsohn et al. 2003; OECD 2007; USEPA 2007). In addition, non-target pests may be assessed especially as they relate to issues of IRM or potential crop weediness. The ERA for Bt-cowpea will be conducted following internationally recognized approaches (Romeis et al. 2011). Data requirements for risk assessment arise during the problem formulation stage, the first stage of the risk assessment process (Romeis et al. 2008). This stage determines the purpose and scope of the risk assessment and guides subsequent data collection (Romeis et al. 2009). Most importantly, in the problem formulation stage those entities or processes needing protection (the protection goals), e.g., protection of pollinators or pest predators, are identified. Once the protection goals are identified, the risk assessment of Bt-cowpea concentrates on estimating the likelihood of harm resulting from the introduced *cry1ab* and *cry2Ab* genes (Raybould 2007a). In addition to outlining protection goals, problem

formulation also develops the assessment endpoints and testable risk hypotheses used to test for potential harm to the protected entity. Together, these data lead to characterization of the risk to the protected entity (Raybould 2007b). While the NTO ERA is conducted for the environment in which the GE crop will be grown, the uniformity and harmonization of the process allows for substantial data transportability, i.e., data from international tests conducted on the transgene and protein of interest, e.g., Cry1Ab and Cry2Ab, can be used in regulatory submissions throughout the world, and in this case, sub-Saharan Africa (Romeis et al. 2009; Raybould and Quemada 2010). Specific studies conducted in an African country can likewise be used in other (African and international) countries.

Protection of biodiversity, specifically NTOs, is one of the management goals defined by countries that are signatories to the Convention on Biological Diversity (SCBD 2000). Because insecticidal GE crops target insect pests, an important part of the ERA is their potential impact on NTOs including organisms providing important ecological services such as biological control of herbivores and pollination (Romeis et al. 2008, 2009; Huesing et al. 2011).

### Implications for non-target risk assessment of insecticidal GE cowpea

Worldwide, governmental regulatory agencies have evaluated Cry1A and Cry2A containing GE crops to determine the potential for direct or indirect toxic effects on non-target birds, mammals, humans and arthropods including beneficial insects found in and around agricultural fields including threatened endangered species found in the USA (Mendelsohn et al. 2003) or Europe (EFSA 2009; CERA 2011, 2013).

The safety assessment of Cry1A- and Cry2A-containing crops is based on: (i) an understanding of several criteria including the mode of action and specificity of Bt Cry toxins; (ii) direct testing of NTOs in feeding bioassays; and (iii) the long history of safe use of Bt Cry toxins both as insecticidal sprays (Federici et al. 2007) as well as *in planta* expression (OECD 2007).

The weight of evidence shows that Cry1A and Cry2A toxins have a very narrow activity spectrum targeting insects in the order Lepidoptera (OECD 2007; CERA 2010, 2011, 2013). Safety assessments of the Cry1A (both Cry1Ab and Cry1Ac) and Cry2A toxins have shown that their insecticidal activity is highly specific for lepidopterans (Huesing et al. 2011; CERA 2010, 2011, 2013). The toxicity and specificity of the Cry1A and Cry2A proteins are associated with their solubilization and proteolytic activation in the digestive tracts of susceptible lepidopteran insects. Following solubilization in the

lepidopteran's slightly basic (~pH 8.0) digestive fluid the toxins bind to specific epithelial brush border membrane receptors. These receptors only occur in the midguts of susceptible lepidopteran insects (OECD 2007; Pigott and Ellar 2007). Since these Cry receptors are not present in non-target birds, mammals and humans these proteins pose essentially no hazard to non-lepidopteran organisms (Wolfersberger et al. 1986; Hofmann et al. 1988; Van Rie et al. 1989, 1990; Shimada et al. 2006a, b; OECD 2007).

Before they were commercially released into the environment, Cry1A and Cry2A class toxins were extensively tested in the laboratory by the technology developer. GE crops expressing the Cry proteins or the proteins themselves were tested against a broad range of pest and beneficial arthropods including species from the Orders Coleoptera, Diptera, Hemiptera, Homoptera, Hymenoptera, Lepidoptera, Orthoptera, Neuroptera, Isoptera, the insect relatives collembola and the crustacean order Isopoda to assess potential toxic effects (OECD 2007; Romeis et al. 2008; Raybould 2007a; CERA 2010, 2011, 2013). These tests were conducted under international regulatory guidelines at toxin concentrations generally exceeding 10X the expected environmental concentration (EEC) (Mendelsohn 2003; OECD 2007; CERA 2010; USEPA 2007, 2010, 2011). Extensive testing was also independently conducted in academic laboratories to assess the safety of Cry1A and Cry2A Bt toxins against NTO beneficial insects including the predators *Chrysoperla carnea* (Neuroptera: Chrysopidae) and *Hippodamia convergens* (Coleoptera: Coccinellidae), the parasitic wasp *Nasonia vitripennis* (Hymenoptera: Pteromalidae), and soil organisms including the collembolan *Folsomia candida* (Collembola: Isotomidae) and the earthworms *Aporrectodea caliginosa* and *Lumbricus terrestris* (Haplotaxida: Lumbricidae) (Romeis et al. 2006; OECD 2007; Wolfenbarger et al. 2008; Naranjo 2009) as well as the honey bee *Apis mellifera* (Hymenoptera: Apidae) (Duan et al. 2008). Data sets collected from field studies have also been analyzed using meta-analysis at the taxonomic and functional guild levels to support the conclusion of safety of these proteins (OECD 2007; Wolfenbarger et al. 2008; Marvier et al. 2007). It appears that the two Cry proteins have a high degree of specificity and have no effect on organisms outside the order Lepidoptera (OECD 2007; Romeis et al. 2008). As part of the risk assessment process, the Cry1Ab and Cry2Ab proteins expressed in cowpea will be assessed for functional equivalency against the same proteins expressed in other Bt crops and if expression levels are comparable, the non-target risk assessment data collected for other Bt crops can be used in the risk assessment for Bt-cowpea. Since cowpea and other commercialized Bt crops harbor similar groups of beneficial arthropods, it is reasonable to conclude that cowpea plants expressing

Cry1Ab and Cry2Ab will pose little risk to NTOs and there is thus no need for additional non-target risk assessment studies.

Since gene flow is expected to occur between cultivated Bt-cowpea and wild cowpea plants (Huesing et al. 2011), NTOs will likely be exposed to the Cry1Ab and Cry2Ab proteins outside of cultivated cowpea. Part of the review process conducted here aims to establish whether unique taxa exist and are exposed to the Bt toxins outside of cultivation to determine whether additional testing may be required to address the risk to these organisms. Since cowpea is a self-pollinated (cleistogamous) crop, exposure to other NTOs will be limited to NTOs that feed on the plant and possibly to bees that might ingest Cry1Ab and Cry2Ab contained in pollen. Fortunately, the safety of Cry1Ab and Cry2Ab to the order Hymenoptera including honey bees (Duan et al. 2008), and for Cry1Ab only, bumble bees (Babendreier et al. 2008) and solitary bees (Konrad et al. 2008) is well established. In addition, only the largest bees, e.g., carpenter bees, are able to penetrate the cowpea flower further reducing the number of organisms that are exposed to Cry1Ab and Cry2Ab (Coulbaly et al. 2002; Pasquet et al. 2007, 2008).

## The Simplified Food Web

Risk to non-target organisms is a function of (i) exposure and (ii) toxicity (Romeis et al. 2008). Accordingly, when formulating risk hypotheses NTOs not exposed to Cry proteins expressed in Bt-cowpea can be excluded from the analysis allowing the risk assessment to focus on those NTOs that are exposed. The simplified arthropod food web for cowpea fields presented above (Fig. 1) can be used to identify which NTOs would be exposed either directly or indirectly to insecticidal Cry1Ab and Cry2Ab proteins in Bt-cowpea (Romeis et al. 2009). Importantly, in this simplified food web not every insect occurring in cowpea is necessarily listed (though the assessment was exhaustively compiled from both the formal and informal literature), but care was taken to ensure that every functional group is well represented and adequate for a robust risk assessment (Romeis et al. 2009). In addition, based on evidence to date as well as the near taxonomic relatedness of wild and cultivated cowpea it is highly unlikely that NTO species occurring in cultivated cowpea would not be present in wild cowpea and vice versa.

While several lepidopteran species feed on cowpea, with the exception of LPB, rarely cause economic damage. These lepidopteran species include a tortricid species as well as a variety of noctuids including *Helicoverpa* and *Spodoptera* spp. Importantly, unsubstantiated field reports have observed the newly introduced spodopteran pest, fall armyworm, on cowpea, but it is not expected to be a serious pest as larvae



develop poorly on the crop (Meagher et al. 2004). As mentioned, lycaenids are routinely found feeding on cowpea, but they too rarely reach pest status (Bottenberg et al. 1997). In no instance has a charismatic lepidopteran species been observed on cowpea in Africa. Accordingly, Bt-cowpea is expected to have negligible impact on lepidopteran species other than the intended target of the technology the LPB.

Based on the risk assessment of all previous Bt-expressing GE crops it is unlikely that phloem-feeding arthropods such as aphids and planthoppers would be exposed to the Bt proteins in cowpea, regardless of their inherent toxicity, since there is no evidence that Bt proteins are transported in the phloem sap of Bt-expressing crops (Lawo et al. 2009; Romeis et al. 2009; Huesing et al. 2011). Accordingly, aphid predators such as coccinellid adults and larvae are unlikely to be at risk because exposure is negligible. Likewise, there would be no Cry exposure to egg parasitoids, since insect eggs have not been found to contain any Cry proteins (Romeis et al. 2013). Thus, only predators or parasitoids that directly consume plant material or that attack herbivores that have fed on plant tissue are likely to be exposed to the insecticidal Cry1Ab and Cry2Ab proteins. Included in this group are predatory and herbivorous beetles such as ladybird beetles and hemipterans such as *Orius* spp. Studies of effects of Cry1Ab on the ladybird beetles *Propylea japonica* and *Hippodamia convergens* established the No Effect Level (NOEL). NOELs of > 500 ppm were observed for *Propylea* and > 20 ppm for *Hippodamia* (Table 1). Likewise, a NOEL > 20 ppm was established for the parasitic hymenopteran *Brachymeria intermedia* (Table 1). Thus, at expression levels observed in Bt-cowpea we can expect negligible effects on these functional groups.

Hymenoptera serve a variety of important ecological functions including their role as parasitoids (e.g., Ichneumonidae), predators (e.g., Eumenidae) and pollinators (Apidae) and could therefore be exposed to insecticidal Cry proteins via several routes. The cleistogamous nature of cowpea was thought to largely limit all but the largest carpenter bees from exposure to Bt-cowpea pollen (Pasquet et al. 2007). New evidence shows that honey bees also pollinate cowpea (Aiswe 2009a, b). Larval parasitoids would be exposed to Cry proteins as a result of parasitizing herbivores feeding on Bt-cowpea. At the dietary exposure levels of Cry proteins in Bt-cowpea event 709A (up to 5.3 ng/mg of plant tissue) (Table 2) effects on larval parasitoids would be highly unlikely. Indeed, the potential toxic effects of Cry1Ab and Cry2Ab on bees has been exhaustively studied with the conclusion of no negative effects at Cry levels far exceeding those observed in Bt-cowpea pollen (Tables 1 and 2) (OECD 2007).

Likewise, predatory omnivorous hemipteran bugs, e.g., *Orius* spp., feed on both pest insects and plant tissues (pollen and young leaves) and are thus potentially exposed to

higher toxin doses as compared to other, obligate, predators, but all studies to date show no adverse effects on these insects at doses far exceeding what they would encounter in Bt-cowpea (Corey et al. 1998; Duan et al. 2007; Lundgren et al. 2008). Likewise, all studies to date show no adverse effects of Cry proteins against Neuroptera species (Table 1).

## Summary

In summary, we show here that using information collected from the African agricultural areas where Bt-cowpea will be released (“the receiving environment”) together with information on the toxicity and mode of action of Cry1Ab and Cry2Ab proteins, we can formulate reasonable testable risk hypotheses to assess the potential effects of Cry1Ab and Cry2Ab expressed in Bt-cowpea and deployed in West Africa. More importantly we can use this information to rule out the need for a number of costly studies that would add little information to the safety assessment of a Bt-cowpea.

The long history of safe use of Bt toxins generally, and the Cry1Ab and Cry2Ab toxins specifically, both as sprayable insecticides and as genes expressed in GE crops, suggests strongly that these proteins are specific for lepidopteran larvae and have not been shown to cause harm to other arthropod species, birds, fish or mammals (CERA 2010, 2011, 2013; OECD 2007). Any assessment can thus focus only on lepidopteran arthropod species that are exposed, either through feeding on cowpea plant tissues or on prey that have fed on cowpea tissues. All lepidopteran insects feeding on cowpea are classified as pests, and none are listed or considered as threatened or endangered.

The beneficial fauna observed in cowpea are predominately comprised of common non-target beneficial arthropods found throughout the world’s agricultural systems. These include hymenopteran parasitoids that attack thrips eggs and larvae as well as predators of thrips such as mites and common Coccinellidae and Staphylinidae beetles. Hemipteran *Orius* sp. predators are encountered as well. The coleopteran predators and *Orius* sp. are known to feed on a variety of food sources including larval lepidopterans. A variety of parasitoids known to attack lepidopteran insects such as LPB larvae is also present in cowpea fields and includes dipteran tachinids and hymenopteran braconids, Chalcididae, Eulophidae and Trichogrammatidae. Spiders, ants and mantids have also been routinely observed. Based on the broad literature review conducted here we conclude that there are no unique arthropod species in the likely deployment area for Bt-cowpea in Africa that have not been assessed elsewhere for other GE crops. Since these non-target risks for Cry1Ab and Cry2Ab have already been assessed in a different context (different plants, different regions) no additional non-target testing

**Table 1** Effect of Cry1Ab and Cry2A proteins on selected non-target insect species

| Insect order | Non-target species            | Type of cry protein   | Dosage          | Response variable                                       | Toxicity          | Reference                |
|--------------|-------------------------------|---|-----------------|---|-------------------|--------------------------|
| Coleoptera   | <i>Propylea japonica</i>      | Cry2Ab provided in artificial diet  | 500 µg/ml       | Nymphal development                                     | No adverse effect | Zhao et al. (2016)       |
| Coleoptera   | <i>Hippodamia convergens</i>  | Cry1Ab single dose  | NOEL > 20 ppm   | Mortality   | No adverse effect | CERA (2011)              |
| Hemiptera    | <i>Orius majusculus</i>       | Cry1Ab supplied by leaves, pollen or phytophagous insect  | Unspecified     | Survival, development, fecundity and fertility          | No adverse effect | Lumbierres et al. (2012) |
| Hemiptera    | <i>Orius tantilus</i>         | Cry1Ab rice-fed thrips along with Cry1Ab rice pollen  | Unspecified     | Nymphal duration, adult longevity, and female fecundity | No adverse effect | Raen et al. (2016)       |
| Hemiptera    | <i>Orius insidiosus</i>       | The predator is given <i>Thrips tabaci</i> fed with Cry2Ab cotton leaves  | 43.637 ng/mg    | Nymphal development                                     | No adverse effect | Kumar et al. (2014)      |
| Homoptera    | <i>Aphis gossypii</i>         | Cry2Ab provided in artificial diet  | 500 µg/ml       | Nymphal development                                     | No adverse effect | Zhao et al. (2016)       |
| Hymenoptera  | <i>Apis mellifera</i>         | Stacked Cry1Ac/ Cry2Ab provided in cotton pollen  | (up to 92 ng/g) | Nymphal development                                     | No adverse effect | Niu et al. (2013)        |
| Hymenoptera  | <i>Apis mellifera</i>         | Cry1Ab Unspecified  | Unspecified     | Adult and larval mortality                              | No adverse effect | Duan et al. (2008)       |
| Hymenoptera  | <i>Apis mellifera</i>         | Cry1Ab/Unspecified  | 20 ppm          | Adult and larval mortality                              | No adverse effect | Duan et al. (2008)       |
| Hymenoptera  | <i>Apis mellifera</i>         | Cry2A/Unspecified   | 50 µg/ml        | Adult and larval mortality                              | No adverse effect | Duan et al. (2008)       |
| Hymenoptera  | <i>Brachymeria intermedia</i> | Cry1Ab single dose in diet  | NOEL > 20 ppm   | Adult mortality   | No adverse effect | CERA (2011)              |
| Diptera      | <i>Exorista civilis</i>       | The parasitoid is given <i>Mythimna separata</i> larvae fed with up to 25 µg/g of Cry1Ab  | Unspecified     | Parasitism and parasitoid development                   | No adverse effect | Jiang et al. (2016)      |
| Lepidoptera  | <i>Bombyx mori</i>            | Stacked Cry1Ac/ Cry2Ab provided in cotton pollen  | 9.2 ng/ml)      | Nymphal development                                     | No adverse effect | Niu et al. (2013)        |
| Neuroptera   | <i>Chrysoperla carnea</i>     | Pollen of Bt maize expressing Cry1Ab  | 5 ng/ml         | Adult survival and female fecundity                     | No adverse effect | Li et al. (2008)         |
| Neuroptera   | <i>Chrysoperla carnea</i>     | Pollen of Bt maize expressing Cry1Ab  | Unspecified     | Adult survival and female fecundity                     | No adverse effect | Romeis et al. (2014a, b) |
| Neuroptera   | <i>Chrysoperla rufilabris</i> | Supplied with larvae of <i>Trichoplusia ni</i> and <i>Spodoptera frugiperda</i> fed on stacked Cry1Ac/ Cry2Ab produced in Bt cotton | Unspecified     | Adult and larval survival and female fecundity          | No adverse effect | Tian et al. (2013)       |

data should be required to come to a conclusion of negligible risk. However, consultation with regional regulators will determine whether the available non-target data on Cry1Ab and Cry2Ab together with field surveys of the arthropod fauna in Bt-cowpea fields in the region will be sufficient for a regulatory assessment.

By making effective use of all relevant data that have been generated previously for the regulatory approval of other GE crops expressing these same insecticidal proteins regulatory approvals for Bt-cowpea in West Africa can be expedited without compromising safety and without incurring extra unneeded costs (Huesing et al. 2011; Kalaitzandonakes et al.

**Table 2** Cry1Ab protein expression in different organs from T5 generation transgenic cowpea line 709A

|                 | Cry1Ab ng/per mg fresh weight tissue |  |
|-----------------|--------------------------------------|--|
|                 | Conventional variety IT86D-716       | Transgenic Event 709A derived from IT86D-716 |
| Roots           | 0                                    | 0.25 ± 0.07                                  |
| Leaf            | 0                                    | 5.3 ± 2.2                                    |
| Flower          | 0                                    | 4.5 ± 0.6                                    |
| Pod             | 0                                    | 3.9 ± 0.4                                    |
| Green cotyledon | 0                                    | 2.1 ± 0.6                                    |
| Dry seed        | 0                                    | 2.5 ± 0.2                                    |
| Pollen          | 0                                    | 0.12 ± 0.08                                  |
| Anther wall     | 0                                    | 1.2 ± 0.2                                    |

(Expression of the Cry1Ab protein in transgenic cowpea line 709A has been quantified using Agdia Bt Cry1Ab/1Ac ELISA kits. By including a protein standard curve using purified bacterial Cry1Ab protein supplied by Monsanto, an accurate quantification of Cry1Ab expression can be calculated) (Personal communication from Higgins TJ)

2007). The focus of any regulatory testing can address any remaining potentially significant risks or uncertainties. For Bt-cowpea this would likely be confirmatory field assessments made on wild cowpeas capable of crossing with the Bt-cowpea variety as well as collection of the standard “familiarity” data that are assessed on all GE crops in the field testing stage of product development. Familiarity data establish the level of similarity of ecologically and agronomically relevant characteristics between the GE crop and its non-transformed comparator. Generally, the familiarity data are collected as part of the regulatory agronomic assessment that considers a small number of non-target pest and beneficial species. In some African countries, these data will be part of a larger field survey. It is anticipated that the familiarity data typically collected for GE crops will also be collected for Bt-cowpea and will lead to a conclusion of minimal risk for the introduction of Bt-cowpea into West Africa.

## Author contributions

All authors participated in the drafting of this paper as individual subject matter experts in their fields, and the authors are solely responsible for the content. Any views expressed in this paper are the views of the authors and do not necessarily represent the views of any organization, institution or government with which they are affiliated or employed. The authors declare no competing financial interest.

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