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Impact of Bt corn pollen on monarch butterfly populations: A risk assessment

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A collaborative research effort by scientists in several states and in Canada has produced information to develop a formal risk assessment of the impact of Bt corn on monarch butterfly (Dananae plexippus) populations. Information was sought on the acute toxic effects of Bt corn pollen and the degree to which monarch larvae would be exposed to toxic amounts of Bt pollen on its host plant, the common milkweed, Asclepias syriaca, found in and around cornfields. Expression of Cry proteins, the active toxin found in Bt corn, occurs among hybrids, and especially so in the commercial hybrids. Bt expression in pollen is low, and laboratory and field studies show no acute toxic effects at any pollen density that would be encountered in the field. Other factors mitigating exposure of larvae include the variable and limited overlap between pollen shed and larval activity periods, the fact that only a portion of the monarch population utilizes milkweed stands in and near cornfields, and the current adoption rate of Bt corn at 19% of North American corn-growing areas. This 2-year study suggests that the impact of Bt corn pollen from current commercial hybrids on monarch butterfly populations is negligible.

Concerning nontarget effects of transgenic crops containing transgenes from the organism Bacillus thuringiensis (Bt) arose after the publication by Losey et al. (1) on the potential risk of corn pollen expressing lepidopteran-active Cry protein to the monarch butterfly, Dananae plexippus. However, the U.S. Environmental Protection Agency (EPA) concluded in an earlier report that the potential impact of Bt corn pollen, which contains variable amounts of Cry protein, on sensitive larvae of Lepidoptera was negligible because of factors that limit environmental exposure (2). Clarification of the risk posed by Bt corn pollen to monarch butterflies can now be undertaken because of the data reported in this issue of PNAS (3–6) that address exposure and toxic effects of Bt corn pollen.

The research contributions reported here represent a collaborative effort established to specifically address the question of risk associated with Bt corn pollen to the monarch butterfly. In December 1999, the EPA issued a data call-in requesting industry, researchers, and all interested parties to submit information and comments by March 2001 for use in evaluation and potential deregistration of corn hybrids containing Cry proteins (http://www.epa.gov/pesticides/biopesticides/otherdocs/bt dcti.htm). The U.S. Department of Agriculture Agricultural Research Service (USDA–ARS) sponsored a Monarch Research Workshop in February 2000 to identify research priorities regarding Bt corn and monarch butterflies, to establish cooperation among researchers, and to respond to the EPA request for data. A request for proposals based on workshop priorities was announced in April, after which a steering committee, including Adrianna Hewings (USDA–ARS), Eldon Ortmam (Purdue University), Mark Scribes (Michigan State University), Eric Sachs (Monsanto), and Margaret Mellon (Union of Concerned Scientists) selected projects to be funded. Funding came from a grant pool provided by ARS and the Agricultural Biotechnology Stewardship Technical Committee (7). The guiding principles for problem formulation followed by the consortium were the elements of risk assessment that underlie the approach by EPA to ecological risk assessment (http://www.epa.gov/NCEA/ecorsk.htm).

Only three papers concerning the impact of Bt corn pollen on nontarget Lepidoptera have been published (1, 8, 9), and they are limited in their application to risk assessment (7). For example, the dose of pollen was not specified in the exposure study by Losey et al. (1), and the study by Jesse and Obrycki (8) used pollen collection and handling techniques that probably resulted in contamination from corn anthers or tassel fragments, which contain significantly higher levels of Cry protein than the pollen (3). Finally, neither study addressed the spatial or temporal potential for exposure by monarch larvae to pollen in cornfields, thereby precluding a risk assessment.

In this paper, we develop a weight-of-evidence approach to the risk of exposure of monarch larvae to Bt corn pollen and the impact of such exposure on populations of the monarch butterfly in eastern North America by using recently published information based on collaborative research by scientists in the U.S. and Canada (3–6). We use an approach to risk assessment that has been performed for many nontarget species in relation to pesticides (10–14), industrial by-products (15, 16), and other potential toxicants found in the environment (17). The approach to this process is consistent, well documented, and standardized (http://www.epa.gov/NCEA/ecorsk.htm). It requires consideration of both the expression of toxicity and the likelihood of exposure to the toxicant as the basic components for a risk assessment procedure.

Materials and Methods

Hazard Identification. Toxicity of purified Bt proteins to larval stages of butterflies and moths is well known (18, 19). Studies conducted on the use of Bt sprays in forests for gypsy moth control have shown that Cry proteins can adversely affect nontarget Lepidoptera (20, 21). Field data from these studies indicated a temporary reduction in lepidopteran populations during prolonged Bt use, although widespread irreversible harm was not apparent (22). Lepidopteran-active Bt protein expressed in pollen of Bt corn hybrids may pose a risk to sensitive species, such as monarch butterflies, in or near cornfields during anthesis (1, 8). Milkweeds, Asclepias spp., and especially common milkweed,

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Abbreviations: Bt, Bacillus thuringiensis; USDA–ARS, U.S. Department of Agriculture Agricultural Research Service; EPA, U.S. Environmental Protection Agency; LOEC, lowest-observable-effect-concentration.

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weed, *A. syriaca* (L.), are the sole larval food source for monarch butterfly larvae and are abundant throughout the corn-growing regions of North America (23). As such, hazard from *Bt* corn pollen deposited on milkweed leaves warrants consideration of its ecological risk to monarch populations.

**Conceptual Model.** Risk assessment requires knowledge of four essential components: (i) hazard identification, (ii) nature of dose response to a toxin, (iii) probability of exposure to an effective dose, and (iv) characterization of risk (24). Components of a risk assessment approach as applied to the case of *Bt* corn and monarch butterfly are depicted in Fig. 1. *Bt* proteins expressed in corn plant tissues can bring about specific reactions in the gut of lepidopteran larvae (25), including nontarget larvae that consume *Bt* corn pollen. The magnitude of the reaction will depend on the type of protein produced by various transgenic events of hybrid *Bt* corn, the amount of protein expressed in pollen grains from different events, the amount of pollen consumed by larvae of different developmental stages, and the susceptibility of larvae to the *Bt* protein. That a hazard may exist was suggested by Losey et al. (1). Characterization of toxic effects is necessary to establish the first component of risk. Laboratory and field assays of lethal and sublethal toxicity resulting from exposure to doses of *Bt* pollen are required to establish toxicity thresholds for comparison against the dose encountered within the environment. These toxicity thresholds will vary based on expression levels for individual *Bt* corn events in conjunction with environmental factors determining ecological exposure.

Consideration of risk as a function of exposure and effect requires that lines of evidence be established in four areas of inquiry: (i) Is there some density of *Bt* pollen on milkweed leaves that represents a lethal or sublethal threat to monarch larvae or later stages of development? (ii) What proportion of *Bt* pollen deposited on milkweed leaves in and around cornfields exceeds the toxicity threshold for larvae of monarchs? (iii) What proportion of monarch populations use milkweed in and near cornfields? (iv) What is the degree of overlap between the phenological stages of monarch larvae and corn anthesis over the shared range of these species? Answers to these questions are possible on the basis of data summarized in the four companion papers (3–6).

**Results**

**Characterization of Effects of *Bt* Corn Pollen.** The Cry1A proteins expressed in most commercial *Bt* corn hybrids are toxic to the monarch butterfly (3). Mortality, expressed as LD$_{50}$, was estimated at 3.3 ng of protein/ml diet, whereas growth inhibition (EC$_{50}$) was estimated to be 0.76 ng/ml (2). However, the expression of Cry1Ab endotoxin within pollen of various events varies considerably depending on the promoter gene involved (26). Expression is greatest in event 176 *Bt* corn (1.1–7.1 µg/gm pollen) (http://www.epa.gov/pesticides/factsheets/factsheets.htm) a line that is being phased out through 2005. This event exceeds, by nearly two orders of magnitude, protein expression in events Bt11 and Mon810 (0.09 µg/gm pollen) (http://www.epa.gov/scicomp/sap/2000/). Growth inhibition, a more sensitive measure of protein intoxication, could be detected at 5–10 grains/cm$^2$. Pollen from other events, including Mon810 and Bt11 corn hybrids as well as events not presently grown, such as Dbt418, Chb351, and Tc1507 (expressing Cry1Ac, Cry9C, and Cry1F proteins, respectively) did not demonstrate lethal or sublethal effects, even at densities above 1,000 pollen grains/cm$^2$ (3). These data were used to establish a no-observable-effect-level for growth inhibition of larvae for event 176 pollen and for Bt11 and Mon810 pollen.

Five field bioassays were undertaken to determine the outcome of exposure of larvae under field conditions on milkweed plants growing or placed in the field. Field studies performed in Iowa, Maryland, New York, and Ontario incorporating natural levels of pollen from *Bt* corn plants (6) demonstrated no acute effects of Bt11 and Mon810 *Bt* corn pollen on survival or growth of monarch larvae. However, impacts of event 176 pollen were observed. In Iowa, reduced weight gain was noted for larvae exposed to event 176 pollen on milkweeds within cornfields at a density of 23 pollen grains/cm$^2$. Both survival and weight gain were affected in Maryland, where a series of assays using milkweed leaves collected from plants in an event 176 cornfield were carried out over the pollen-scatter period. After 6 and 9 days of accumulation of pollen within the cornfield, pollen concentrations on milkweed leaves reached an average of 67 and 161 grains/cm$^2$. Survival of first instars was reduced by 60 and 51%, respectively, compared with larvae exposed to milkweed leaves collected from outside *Bt* cornfields. Weight gain of survivors was reduced because of consumption of *Bt* pollen, but only significantly so after exposure to pollen accumulated over a 6-day period (6).

In a separate field trial in Maryland, effects on survival and growth of first instar monarchs on leaves of milkweed within a field of a sweet corn hybrid expressing Bt11 endotoxin were evaluated and compared with the effects of residues after applications of a pyrethroid insecticide. Survival of larvae that fed on insecticide-treated milkweed leaves from within the cornfield was low (0–10%). Survival also was influenced significantly (65–79%) by insecticide that drifted onto milkweeds leaves 3 m outside the field. In contrast, survival of larvae exposed to leaves taken from within both *Bt* and non-*Bt* corn plots ranged from 80 to 93%, and there were no significant differences in larval survival between these two plots (6).

**Characterization of Exposure to *Bt* Corn Pollen.** Exposure depends on (i) phenological overlap between monarch populations and corn anthesis, (ii) spatial overlap between milkweeds used by monarchs and cornfields, and (iii) pollen densities encountered on leaves of milkweed plants in and near cornfields.

**Phenological Overlap.** Pollen from corn plants within a particular field is shed over a period of 1–2 weeks between mid-July and
mid-August during the season, whereas larvae develop over a more prolonged period. Potential for exposure of susceptible stages of monarch larvae to corn pollen depends on synchrony of their development with pollen shed of corn plants. Locations in four corn-growing regions were monitored for phenological development of monarchs post-pupation and anthesis (4). Spatial overlap of these locations was established in Iowa, Maryland, Minnesota, Wisconsin, and Ontario. Overlap of the more susceptible stages of monarchs, primarily first and second instars, with pollen shed was considered for purposes of risk assessment.

The presence of susceptible larvae at the time of corn anthesis varied considerably across the regions studied (4). In the more northern locations (Minnesota/Wisconsin and Ontario), about 40 and 62% of the larvae overlapped with pollen shed, respectively, whereas in areas further south (Iowa and Maryland), about 15 and 20% of the larval stages overlapped, respectively. Data from a computer simulation of monarch phenology and corn development support the general observation that overlap increases at higher latitudes across the Corn Belt (D. Calvin, Department of Entomology, Pennsylvania State University, University Park, PA, personal communication). Projected overlap from these simulations is likely overestimated because in the model, 30-year average temperature data were used, whereas our in-field measurements were made during 2000 in three to five specific fields at each of four locations.

**Spatial Overlap.** Density of milkweed stands in cornfields compared with nonagricultural lands and data on the proportion of the landscape in corn and nonagricultural lands provided a basis on which to determine the proportion of the milkweed population that was in cornfields (4). In all locations, densities were higher in nonagricultural lands than in cornfields, but the range of difference was considerable. In Minnesota/Wisconsin and Iowa, the density of milkweed was approximately four to seven times greater in nonagricultural fields than in cornfields, whereas in Ontario, the density was up to 115 times greater. In areas where corn is more intensively cultivated, as in Iowa and southern Minnesota/Wisconsin, less nonagricultural land exists, and the overall proportion of milkweed on a landscape basis is higher in cornfields and other crop lands than in nonagricultural land. In regions of the corn-growing area where mixed habitats are more common, such as in Maryland and Ontario, milkweeds are more abundant in the nonagricultural landscape and provide proportionately greater habitat than those in cornfields (4).

The likelihood of monarch larvae feeding on milkweed plants in cornfields depends not only on what proportion of milkweeds are in cornfields but also on the relative usage by monarchs of milkweeds in cornfields relative to milkweeds in other habitats. Observations from the four regions studied indicated that monarch butterflies locate and lay eggs on milkweeds in corn despite the canopy of the crop obscuring the milkweeds. Sampling done in cornfields and in nonagricultural land in these areas suggests that egg densities per plant are higher in corn in Iowa and Minnesota/Wisconsin but are the same in cornfields and nonagricultural lands in Maryland and Ontario (4). In Iowa, egg densities were higher also in soybean fields than in nonagricultural areas.

**Pollen Densities Encountered.** Dispersal of corn pollen was described by Raynor et al. (27), who demonstrated deposition of pollen as much as 60 m from field edges. Because of the rapid decline in concentration of pollen from the field margin outward, risk assessment concerns are focused on the concentration of pollen on milkweed leaves within the cornfield and those leaves found outside the field up to 5 m from the field edge. During the period of pollen shed, samples of pollen were collected on sticky trap surfaces and on milkweed leaves (5). Samples were taken at various distances within and beyond the margins of cornfields to estimate the concentration of pollen that could be encountered by monarch larvae. Data from three locations, Iowa, Maryland, and Ontario (5), demonstrated a 5-fold reduction in concentration of pollen from just within the edge of the cornfield to about 2–3 m distant. Within-field densities across the different studies averaged between 65 and 425 pollen grains/cm² on milkweed leaves at the peak of corn anthesis, with an average of 171 grains/cm². From these data, frequency histograms were derived to determine the likelihood of encountering by first or second instars of different concentrations of pollen within and outside cornfields. These frequency distributions can be used to determine the probability of a larva encountering a toxic pollen dose.

**Risk Characterization.** To determine risks to monarch larvae associated with *Bt* corn pollen, two components of greatest significance are: (i) the frequency with which effective environmental concentrations exceed the thresholds for mortality or sublethal effects, such as growth inhibition, of each *Bt* pollen type, and (ii) the proportion of monarch larval populations in eastern North America that are exposed to toxic levels of *Bt* pollen.

**Probability of Toxicity.** It is clear from both laboratory and field-based studies (3, 6) that pollen from the dominant commercial *Bt* corn hybrids (Mon810 and Bt11) does not express Cry1Ab protein to a level that will impact monarch populations to any significant degree. Hellmich et al. (3) suggested a conservative lowest-observable-effect-concentration (LOEC) be established for these hybrids at 1,000 pollen grains/cm² of milkweed leaf surface on the basis of a combined analysis of laboratory bioassays exposing larvae to 1,000–1,600 pollen grains/cm². Growth inhibition was evident for larvae exposed to event 176 pollen at 5–10 grains/cm², the lowest dose where activity was noted by Hellmich et al. (3), therefore the effective environmental concentrations for event 176 corn pollen will frequently exceed this threshold in fields where it is planted.

Probabilities of toxicity for events 176, Bt11, and Mon810 pollen are depicted in Fig. 2 as a dose–effect relationship for event 176 pollen and for larvae exposed to pollen from Bt11 corn hybrids. These two response curves are compared with the average cumulative proportion of pollen on milkweed leaves as recorded within Iowa and Ontario cornfields during 1999–2000.
response (the Cry1Ab protein is identical in each event) and with a LOEC established, for sake of argument, as a range between 1,000 and 4,000 grains/cm². Pollen deposition on milkweed leaves during 1999–2000 (5) is represented on a separate scale in a cumulative frequency occurrence curve.

It is apparent from Fig. 2 that significant overlap of commonly encountered concentrations of pollen from event 176 hybrids with doses necessary for growth inhibition (and mortality) would likely occur within or near cornfields. For example, over 50% of a cohort of first instars exposed to 10 pollen grains/cm² on milkweed leaves would be expected to exhibit growth inhibition. When compared with the pollen deposition curve, 90% of the samples of milkweed leaves examined in our study of pollen deposition had a density at or above this level. By contrast, the LOEC range for Bt11 and Mon810 of 1,000–4,000 pollen grains/cm² would be encountered by larvae in only 0.7–0.1% of natural in-field situations. Pollen deposition estimated from any single sample over two seasons never exceeded 1,600 grains/cm² (3, 5). Even if the LOEC for Bt11 and Mon810 were established at the conservative concentration of 1,000 grains/cm², 99.3% of encounters by monarch larvae of pollen would be below this concentration (5).

To illustrate the potential impact of each pollen type on first instar monarchs exposed to event 176, Bt11, and Mon810 pollen within cornfields, a joint probability curve (Fig. 3) was constructed (http://www.epa.gov/NCEA/ecorisk.htm; ref. 14). The likelihood of exposure is plotted against the incidence of growth inhibition as derived from data in Fig. 2. For event 176 pollen, the impact would be significant, as depicted by the area under the curve (AUC, 84%). In contrast, the impact for Bt11 corn pollen (AUC, 0.1%) would be considered negligible.

Probability of Exposure. Milkweeds exist in cornfields across most of the North American corn-growing regions, and monarch butterflies use this resource as a host for their offspring during the period of pollen shed (4). Quantification of the proportion of monarch populations in each region potentially exposed to Bt corn pollen is difficult to ascertain. Our data, collected over a single season at four locations throughout the corn-producing area of North America, illustrate the various factors influencing potential exposure to Bt corn pollen (4). These data are insufficient to provide a definitive estimate of exposure in most cases, but a bounding estimate is possible. Wassenaar and Hobson (28), by using isotope analysis of overwintering monarchs in Mexico, estimated that 50% of the monarch population originates within all or part of 15 states and one province that represent the central core of the North American Corn Belt (Table 1). More than 93% of North American corn is grown in this area, which extends from eastern Kansas/Nebraska to western New York. By using USDA statistics, we estimate that about 28% of crop and pasture land within this area, which together constitute the monarch breeding habitat, consists of corn (Table 1). Adoption of Bt corn across this area encompassing 50% of the monarch-breeding habitat was about 19% of the corn crop in 2000 (29).

Distribution of milkweeds within and around cornfields is variable across the Corn Belt. In Iowa and southern Minnesota, milkweed in cornfields represents a large proportion of the total abundance in those areas, but in Ontario and Maryland, where corn represents a smaller proportion of the landscape, milkweed in cornfields constitutes only a small proportion of its overall abundance (4). These data provide a variable picture, but by using data from Iowa, a suitable estimate of exposure to Bt corn pollen by monarchs can be obtained. In addition to the fact that a significant proportion of land in Iowa is devoted to corn production, a milkweed plant in cornfields was 1.7 times more likely to receive a monarch egg than a milkweed plant in nonagricultural land (4). Even though milkweed densities are approximately seven times higher in nonagricultural land than in cornfields, the proportion of monarch larvae contributed by milkweed from within cornfields is 45 times greater than that of nonagricultural land. If all of the landscape within Iowa that represents breeding habitat for monarchs is coupled with the higher per-plant egg densities on milkweeds within cornfields, the relative density of milkweeds in different habitats and the predominance of corn as a proportion of the total habitat, 56% of monarchs in Iowa are estimated to originate from within cornfields (4). This value probably differs considerably from region to region, but we do not have comparable data for other locations. From the data available (Table 1), we consider the situation in Iowa to represent the upper end of the exposure scale.

Temporal overlap of pollen shed with the presence of sensitive larvae in Iowa was 15% (4). An estimate of the probability of exposure (Pe) to Bt corn pollen by larvae of the final monarch generation arising within Iowa can be expressed as:

$$P_e = \frac{l \times \alpha \times a}{0.56 \times 0.15 \times 0.25} = 0.021.$$  

or 2.1% of the population, where Pe = probability of exposure, l = proportion of monarchs from corn, α = overlap of pollen shed with susceptible larval stages, and a = adoption rate of Bt corn. Because this represents an estimate of the potential exposure for Iowa, similar data would be required to estimate the probability of exposure for other locations in the Corn Belt. We do not have complete data for monarch and milkweed densities across the Corn Belt and cannot assume that relative productivity of crop and nonagricultural habitats is the same in other states. For Iowa, the proportion of the monarch population estimated to come from corn, 56%, was roughly similar to the proportion of the breeding habitat in Iowa that is corn (42%; Table 1). If we assume that this same relationship holds in other areas, we can use the proportion of corn grown relative to the total breeding habitat in other states (from Table 1) as an estimate of relative monarch production.

Estimates of three exposure factors and the estimated contribution of each state and province to ~50% of the eastern North American monarch population arising from the portion of the Corn Belt, as indicated by Wassenaar and Hobson (28), provides a broad view of potential exposure (Table 2). Our estimates of overlap of the pollen-shed period in each location
with the presence of monarch larvae are based partly on the projections of the simulation model described previously and partly on our own observations. In this instance, our estimate for the exposure of monarchs in the Corn Belt states and Ontario is 1.6%. Because monarchs in the Corn Belt represent 50% of the total monarch population, the exposure for the entire monarch population would be no greater than 0.8%.

The proportion of the population of monarchs in Iowa that would be exposed to pollen levels that exceed the no-observable-effect-level for each event \((P_i)\) can be derived from data presented in Fig. 2. For event 176 pollen, monarch larvae would likely encounter pollen densities equal to or exceeding the LOEC in 90% of field situations during anthesis, whereas this would be true in only 0.7% or less of field situations for Bt11 and Mon810 pollen. Overall risk \((R)\) is the combined probability of exposure and toxic effect or:

\[
R = P_c \times P_t. \tag{2}
\]

If we assume that event 176 comprised 5% \((a\ \text{from Eq. 1} = 0.05)\) of planted corn acres in Iowa \((or\ 20\%\ \text{of planted Bt corn acres in 2000})\), an extreme upper bound estimate based on historical marketing data, the risk of impact \((R)\) to monarch populations exposed to effects from event 176 pollen is:

\[
R = P_c \times P_t = 0.0042 \times 0.9 = 0.0038, \tag{3}
\]

or 0.4% of the population. The LOEC of pollen for all other events \((\text{Bt11 and Mon810 comprise the remaining 20% of total area planted; } a = 0.20)\) equals or exceeds 0.7% of expected pollen densities, thus the proportion of the monarch population at risk of impact from effects of Cry proteins, other than event 176, in Bt cornfields in Iowa is:

\[
R = P_c \times P_t = 0.0168 \times 0.007 = 0.00012, \tag{4}
\]

or 0.012% of the population. The combined risk estimate for monarchs in Iowa is the sum of these two values, or 0.41%.

Following the same logic as above and assuming that \((i)\) adoption rate of Bt corn reached its maximum limit of 80% (based on current refuge requirements) \((a = 0.80)\) in Iowa, and \((ii)\) pollen from current and future Bt corn events will pose a hazard less than or equal to that established here for Bt11 and Mon810, the proportion of the monarch population in Iowa that would be at risk with market saturation is:

\[
R = P_c \times P_t = 0.067 \times 0.007 = 0.00047. \tag{5}
\]

Table 1. Parameter estimates for probability of exposure \((P_i)\) of monarch larvae to Bt corn pollen within cornfields in states and provinces of the Corn Belt that constitute 50% of the eastern North American monarch population

<table>
<thead>
<tr>
<th>State</th>
<th>(l^*)</th>
<th>(a^*)</th>
<th>(a)</th>
<th>(m^*)</th>
<th>(P_e)</th>
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<tr>
<td>IA</td>
<td>0.560</td>
<td>0.15</td>
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<td>0.0026</td>
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<td>0.07</td>
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<tr>
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<td>0.26</td>
<td>0.038</td>
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</tr>
<tr>
<td>KY</td>
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<td>0.11</td>
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<td>&lt;0.0001</td>
</tr>
<tr>
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<td>0.0002</td>
</tr>
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<td>0.11</td>
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</tr>
</tbody>
</table>

Average (total): 0.253 0.28 0.17 (0.020) (0.0161)

*i, proportion of monarchs from corn; o, overlap of pollen shed with susceptible larval stages; a, adoption rate of Bt corn.

Values marked with * were derived from field observations in 2000 (see ref. 4).

\(m\) represents the proportion land area of each state or province that constitutes 50% of the breeding habitat of the eastern North American monarch population.
Monarch populations share their habitat with corn ecosystems to a degree previously undocumentd (4). Despite this conclusion, the portion of the monarch population that is potentially exposed to toxic levels of Bt corn pollen is negligible and declining as planting of event 176 hybrids is phased out through 2003. The exposure portion (P) of the risk (R) equation described above is low, and the toxicity portion (P) of this equation for the dominant corn hybrids is negligible, therefore the impact of Bt corn on monarch populations should remain low.

Evidence supporting this risk conclusion has been collected over a wide geographic area and under a variety of conditions in both laboratory and field settings (3–6). Findings from studies done in multiple locations were consistent, even though methods differed from one study to another. This approach to risk characterization is consistent with accepted risk assessment procedures and shares many similarities with previous assessments over a wide range of situations describing potential risk associated with a described hazard. It is imperative that future conclusions concerning the environmental or nontarget impacts of transgenic crops be based on appropriate methods of investigation and sound risk-assessment procedures.

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