

# Genetic engineering of *Plum pox virus* resistance: ‘HoneySweet’ plum—from concept to product

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Received: 25 March 2013 / Accepted: 29 May 2013  
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**Abstract** Sharka disease, caused by *Plum pox virus* (PPV) was first recorded in Bulgaria during the early twentieth century and since that first report, the disease has progressively spread throughout Europe and more recently to Asia, Africa, North and South America. Few PPV resistance genes have been found to naturally occur in *Prunus* and this has led to the investigation of biotech approaches to the development of resistance through genetic engineering (GE). A notable example of the utility of this approach is ‘HoneySweet’ plum. PPV protection in this case is based on RNA interference (RNAi) and resistance has been shown to be highly effective, stable,

and heritable as a dominant trait. Extensive testing and risk assessment of ‘HoneySweet’ in laboratory, greenhouse and in the field for over 20 years has demonstrated not only the effectiveness but also the safety of the technology. ‘HoneySweet’ has been cleared for cultivation in the USA. By the appropriate regulatory agencies. The development and regulatory approval of ‘HoneySweet’ demonstrate the ability of RNAi technology to contribute to the sustainability of stone fruit production in regions impacted by PPV. Although it has taken almost 100 years since the identification of sharka, we are now able to effectively protect stone fruit species against this disease through the application of GE.

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**Keywords** Fruit breeding · Genetic engineering  
regulation · Genetic Modification · Pathogen-derived  
resistance · Plum · *Prunus domestica* · Rapid cycle  
breeding · Risk assessment · RNAi · siRNA · Rosaceae ·  
Sharka · Transgenic plants

## Introduction

*Plum pox virus* (PPV) is the most serious viral disease of the genus *Prunus*. Because of this, there is a vast amount of literature concerning PPV covering virtually all aspects of this organism’s biology and its interactions with its hosts. This review focuses on the development of host plant resistance to this virus through genetic engineering, and specifically, resistance based on RNA interference (RNAi). In the past decade the literature on RNAi has expanded exponentially. The application of this technology to PPV resistance has been recently and comprehensively reviewed (Ilardi and Di Nicola-Negri 2011). In the context of the biology of PPV and RNAi technology, the current review

seeks to present an example of the use of RNAi to provide long-term, stable protection against PPV in a commercial *Prunus* species (*P. domestica*) by reviewing the process from the development of the concept, through the research and development pipeline, through the US regulatory process, and exiting the pipeline with a commercially viable PPV resistant plum variety.

### Plum pox virus

Sharka disease caused by PPV was first observed in Bulgaria during the First World War in 1917 and described by Atanassoff (1932). By the late 1970s the disease had spread throughout Europe (Roy and Smith 1994) and despite the considerable efforts made in respect to sharka containment, the disease has been reported in stone fruit producing countries worldwide except Australia, New Zealand and South Africa (Table 1) (Barba et al. 2011; OEPP/EPPO Bull 2006).

*Plum pox virus* (PPV) is classified in the family *Potyviridae* and the genus *Potyvirus* and has been well characterized molecularly (James and Glasa 2006; Olmos et al. 2006). PPV hosts include cultivated, ornamental and wild *Prunus* species (Damsteegt et al. 2007). Non-*Prunus* species, in at least nine plant families, have been infected artificially with one or more strains of the virus, and in some cases have been found naturally infected in the field (van Oosten 1971; Llácer 2006). Generally, PPV affects the fruits of sensitive cultivars of the commercially cultivated stone fruits such as plums (*P. domestica*, *P. salicina*), apricots (*P. armeniaca*), peaches and nectarines (*P. persica*). Cherries (*P. avium* and *P. cerasus*) can be infected by PPV C strain (Crescenzi et al. 1995; Kalayshan et al. 1994; Nemchinov and Hadidi 1996) and almond (*P. dulcis*) can also be infected (Llácer and Cambra 2006). Symptoms of sharka disease vary widely depending on the crop, the cultivar, the virus strain, and the environment. Affected plum fruits are deformed and show deeply engraved rings, irregular lines, and fruit malformation. The flesh turns brownish red and is saturated by gum and is unsuitable for marketing (Fig. 1). Up to 90 % of fruit fall prematurely and these fruit are unsuitable both for direct consumption and for industrial processing (Kegler and Schade 1971; Kegler and Hartmann 1998). Similar symptoms of PPV infection are common on apricot, peach, nectarine, and other stone fruits. Most stone fruit varieties show leaf symptoms which appear as pale or yellow green rings, diffuse spots or leaf mottling, chlorotic oak-leaf patterns, shallow depressions, and shoots may split and die back. Peach and plum blossoms of PPV-infected trees can also show symptoms, consisting of darker, pink colored speckles on the pink colored petals of the peach ([http://web.pppmb.cals.cornell.edu/fuchs/ppv/ppv\\_symptoms.php](http://web.pppmb.cals.cornell.edu/fuchs/ppv/ppv_symptoms.php)). Highly sensitive plum cultivars such as ‘Ortenauer’, in

**Table 1** World-wide spread of PPV as recorded in the literature

Country or region	Year of detection	Citation
Bulgaria	1917	Atanassoff (1932)
Bohemia (former Czechoslovakia)	ND	Blatný (1930)
Moravia (former Czechoslovakia)	ND	Atanassoff (1932)
Former Yugoslavia	1935	Josifović (1937)
Hungary	1938	Szirmai (1948)
Romania	1922	Minoiu (1997)
Albania	1947	Papingyi (1965)
Germany	1956	Schuch (1957)
Austria	1961	Vukovits (1961)
Poland	1958	Szczygieł (1962); Pieniazek (1962)
Moldova	1962	Verderevskaia (1965)
Netherlands	1966	Meijneke (1967)
Greece	1967	Demetriades and Castimbas (1968)
United Kingdom	1968	Cropley (1968)
Turkey	1968	Sahtiyanci (1969)
France	1970	Desvignes and Morvan, personal communication
Sweden	ND	Anonymus (1970)
Italy	1973	Canova et al. (1977)
Belgium	1974	Maroquin and Rassel (1976)
Spain	1984	Llácer et al. (1985)
Portugal	1984	Louro and Corvo (1985)
Egypt	1984	Dunéz (1987)
Syria	1984	Dunéz (1987)
Cyprus	1984	Dunéz (1987)
Chile	ND	Acuna (1993)
Azores	ND	Mendonca et al. (1997)
India	ND	Thakur et al. (1994)
USA	1999	Levy et al. (2000)
Canada	2000	Thompson et al. (2001)
Argentina	2004	Dal Zotto et al. (2006)
Kazakhstan	2003	Spiegel et al. (2004)
China	ND	Navratil et al. (2005)
Pakistan	ND	Kollerova et al. (2006)
Japan	2010	Maejima et al. (2010)

ND: year of detection not determined

addition to fruit and leaf symptoms, show bark splitting and cankers on the shoots that become dry and brittle and die. Infected highly susceptible trees decline within only a few years (Kegler and Hartmann 1998).

The main pathway of long-distance PPV spread is through the use of infected propagative material and the distribution of infected trees. Once sharka has become established in an orchard aphids transmit the virus locally.

**Fig. 1** *Plum-pox virus* symptoms: (left) fruit marking and deformation on mature *P. domestica* fruit (right) typical chlorotic ring development on *P. domestica* leaves



More than twenty aphid species are known to transmit PPV (Labonne et al. 1995; Gildow et al. 2004; Isac et al. 1998; Wallis et al. 2005). PPV is a non-persistently transmittable virus (Kunze and Krczal 1971). Aphids can acquire the virus from infected material in as short as 30 s and can transmit it for up to 2–3 h after acquisition (Moreno et al. 2009). These short periods are sufficient for spreading the virus within nurseries or orchards. PPV can be spread in orchards by transient aphids as efficiently as aphids colonizing *Prunus* species (Labonne et al. 1995). The speed of natural spread in orchards depends on the distance of the healthy trees to the infection sources. It has been shown that within a 100 m diameter from an infected individual tree, 48–100 % of the previously healthy trees have become infected within 10 years (Jordovic 1968). Systemic spread of the virus within a tree may take several years (OEPP/EPPPO 1983). The virus may be detected in seed coats and cotyledons, but embryonic tissue and seedlings obtained from germinated seeds have not shown infection, therefore, PPV is not considered to be seed transmitted (Pasquini et al. 1998, 2000; Glasa et al. 1999; Polák and Komínek 2001; Pasquini and Barba 2006; Milusheva et al. 2008; Zagrai and Zagrai 2008).

The reduced fruit quality and premature fruit drop caused by sharka disease make stone fruit production in some European countries problematic (Kamenova et al. 2010). Cambra et al. (2006) have summarized production and losses in countries affected by PPV. Production for European plums was 3 million metric tons (mt) and losses were 1.5 million mt per year with an approximate value of €5,400 M over a 30 year period. The loss of apricot fruit was 0.6 million mt per year with an approximate value of €3,600 M for a 30 year period. Sharka has changed the landscape of stone fruit cultivars. For example, as early apricot cultivars are much more sensitive in terms of symptom expression on fruits than the late cultivars, many early local cultivars have progressively been substituted by later ripening tolerant varieties that show few or no symptoms on fruit (Cambra et al. 2006).

In countries not affected by PPV or with localized and quarantined infection zones primary focus is placed on

preventing the introduction of PPV into uninfected fruit-growing areas. The development and enlargement of the European Union (EU) with increased movement and trade between countries with different levels of PPV infection and with different strains of the virus is likely responsible for the spread of PPV in general, and the wider distribution of the various PPV strains. The movement of PPV infected plant material from infected to non-infected or only partially-infected countries in Europe, along with the potential for spread of the more severe strains of PPV have been causes of great concern. Over the past 25 years over €33 M has been spent in Europe on programs to conduct research on sharka control (Cambra et al. 2006) including the recent SHARCO project funded at over €3.5 M that specifically addressed “Sharka containment in view of EU-expansion” (<http://www.sharco.eu/sharco/> accessed March 19, 2013).

To prevent the long-distance spread of PPV within a state, country, or region, quarantine has been the first line of defense. Another element of the strategy in preventing virus introduction to a new area is the use of certified planting stock that has been tested and verified to be free of PPV (Polák et al. 1992). Unfortunately, visual inspections carried out on PPV tolerant cultivars which remain symptomless while infected have little value in terms of quarantine or certification programs. Once PPV is introduced into a new area the next control measure is the elimination of virus infected plants as quickly as possible before the disease spreads. Since the infected trees cannot be cured or the virus eliminated, infected trees must be eradicated.

### PPV in North America

In December 1999, PPV was detected in peach and plum trees in orchards in Adams County, Pennsylvania (Levy et al. 2000). This detection resulted in what was to become a 10-year eradication program that cost over \$65 M and resulted in almost the complete elimination of stone fruits in the affected Pennsylvania counties. In 2000 PPV was detected in Canada and after a decade long unsuccessful eradication effort PPV is now under a 5 year monitoring

and management program (<http://www.inspection.gc.ca/plants/plant-protection/diseases/plum-pox-virus/monitoring-and-management-program/eng/1323887724804/1323889930176>, accessed March 21, 2013). While only one strain was detected in Pennsylvania (PPV-D), three strains of PPV have been detected in Canada; PPV-D, Rec, and W (Thompson et al. 2001, 2009; James et al. 2003; James and Varga 2005, 2011). The future status of PPV in Canada is uncertain. Although PPV was eradicated in Pennsylvania it has since appeared in New York State in 2006 close to the border with Canada (<http://www.agriculture.ny.gov/PI/ppv/ppv.html> accessed March 18, 2013). The potential spread of PPV in the US and the presence of PPV on the northern border is cause for great concern for stone fruit production in the US. *P. domestica* plums are particularly susceptible. California produces nearly 100 % of US dried plums and accounts for roughly 60% of world dried plum production, exporting to approximately 70 countries ([http://www.agmrc.org/commodities\\_products/fruits/prunes-profile/](http://www.agmrc.org/commodities_products/fruits/prunes-profile/), accessed March 19, 2013). In 2012 there were 55,000 bearing acres of *P. domestica* in the California producing 120,000 tons with a value of \$164.4 M ([http://www.nass.usda.gov/Statistics\\_by\\_State/California/Publications/Fruits\\_and\\_Nuts/201206prunf.pdf](http://www.nass.usda.gov/Statistics_by_State/California/Publications/Fruits_and_Nuts/201206prunf.pdf), Accessed March 19, 2013). PPV presents a serious risk to this industry. The need for PPV host-plant resistance is clear.

### Resistance breeding

If eradication of PPV from an area is not possible and trees cannot be adequately protected from virus transmission by aphids due to the non-persistent mode of transmission, host plant resistance to the virus is the only remaining viable control strategy and is, in fact, the most sought-after means of control. Despite the fact that resistance to PPV has been pursued ever since the disease was first identified, there are few reports of high level resistance in commercial *Prunus* species. While resistance to PPV in genotypes of European plum have been reported these have generally not been durable or effective against all virus strains (Kegler et al. 1985, 1995). No immune or highly resistant genotypes within *P. domestica*, *P. spinosa* and *P. insitita* have yet been found. While most *P. cerasifera* germplasm is PPV susceptible one resistant clone has been identified but the basis of resistance or its durability is unknown (Minoiu et al. 1998). The lack of high level resistance in cultivated *P. domestica* plums has directed the attention of breeders towards hypersensitivity as a means of resistance. The cultivar ‘Jojo’ (Hartmann and Petruschke 2000; Hartmann and Neumüller 2006; Neumüller et al. 2010) which reacts to PPV inoculation with a hypersensitive reaction was introduced as the first completely resistant plum variety. While this variety appears to have exhibited a high level of

resistance to PPV in the field there remain questions concerning the performance of trees under high inoculation pressures and the potential for virus movement through hypersensitive plants. Resistance may be virus strain-dependent and the virus can apparently move through the vessels of ‘Jojo’ (Polák et al. 2005a, b; Polák and Jarošová 2012). Observations in Romania have revealed that when young trees of ‘Jojo’ are fed upon by PPV-carrying aphids, tree death may occur as a result of the hypersensitive response (Zagrai, personal communication). The apparent multigenic nature of the hypersensitive response and the varying levels of hypersensitivity that occur in seedlings (Neumüller and Hartmann 2008; Lichtenegger et al. 2010) make breeding for this type of resistance a long-term process. Nevertheless, hypersensitivity represents a potentially valuable resistance mechanism that requires continued attention.

Naturally-occurring high level resistance to PPV has been identified in apricot originating from a small group of cultivars developed in North America (Polák and Komínek 2012) and these have been used as donors in the development of new PPV resistant apricot varieties through conventional breeding (Badenes and Llácer 2006; Dosba et al. 1992; Karayiannis et al. 1999). While the mechanism of resistance is as yet unknown, in order to improve selection efficiency, resistance has been mapped and molecular markers for PPV resistance in apricot have been developed (Salava et al. 2001, 2002; Dondini et al. 2011; Lalli et al. 2008; Lambert et al. 2007; Marandel et al. 2009; Soriano et al. 2012; Zhebentyayeva et al. 2008). High resolution mapping using simple sequence repeat markers has produced markers tightly linked to PPV resistance and use of these markers will increase the efficiency of the selection of PPV resistant apricot progenies (Soriano et al. 2012).

The paucity of high-level resistance to PPV in most *Prunus* species, incompatibility barriers between species, and long generation times associated with tree fruit breeding suggest that additional genetic improvement technologies are needed to develop stone fruit varieties highly resistant to PPV. Genetic engineering of papaya with the *Papaya ringspot virus* (PRSV) coat protein (CP) gene provided high levels of resistance to PRSV (another potyvirus) in a rapid and efficient manner and essentially saved the Hawaiian papaya industry (Gonsalves 1998; Ferreira et al. 2002). This strategy is generally referred to as pathogen-derived resistance (Sanford and Johnston 1985). Resistance may be the result of protein expression (Beachy et al. 1990) or RNA, specifically small interfering RNAs (Fire et al. 1998; Hamilton and Baulcombe 1999).

Prior to the discovery of PPV in the US, the United States Department of Agriculture-Agricultural Research

Service (USDA-ARS) began a program of pre-emptive breeding for PPV resistance. In 1989 researchers at the USDA-ARS Appalachian Fruit Research Station (AFRS), Kearneysville, West Virginia began work on the development of resistance to PPV through genetic engineering. Plums were first engineered with the *Papaya ringspot virus* (PRSV) coat protein (CP) gene (kindly provided by Dr. Dennis Gonsalves, Cornell University, Geneva, NY; currently USDA-ARS, Hilo, HI) which was used to develop PRSV resistant papayas (Gonsalves 1998; Ferreira et al. 2002). The PRSV-CP gene was thought to have sufficient homology to the PPV-CP gene to provide resistance to PPV. At the time that this work began, virus resistance was expected to be protein-mediated (Beachy et al. 1990). Protection against PPV in transgenic plums expressing PRSV-CP was effective for several years in greenhouse tests, but after 32 months trees became fully infected (Scorza et al. 1995). The PPV-CP gene was sequenced and cloned (Ravelonandro et al. 1992) and through a collaboration between D. Gonsalves, M. Ravelonandro and R. Scorza the PPV-CP gene was engineered into the plasmid pGA482GG (Fitch et al. 1990; Ling et al. 1991) previously used to engineer PRSV resistant papayas. In the US transgenic plants were inoculated with PPV in a containment greenhouse under a USDA-Animal and Plant Health Inspection Service permit (APHIS). Plants were also greenhouse tested at INRA, Bordeaux, France. One transgenic plum clone, C5, was identified as highly resistant to PPV through aphid- and graft- inoculation. This clone did not express PPV-CP and produced barely detectable levels of CP mRNA. Clones that did express the CP gene proved to be susceptible (Ravelonandro et al. 1997; Scorza et al. 2001). This suggested a resistance mechanism that was not protein-mediated. Molecular analyses have shown that C5 contains intact and partial copies of all three of the insert transgenes and the expression of the three genes is unequal. The PPV-CP transgene, produced only exceedingly low amounts of RNA transcript and no detectable PPV-CP (Scorza et al. 1994). The other two transgenes, *nptII* and *uidA* (GUS), express their respective proteins.

Further molecular analyses of the C5 PPV-CP transgene demonstrated a high level of RNA expression in the nucleus, yet low levels of PPV-CP mRNA in the cytoplasm, a complex multicopy insertion with partial insert copies, transgene methylation and confirmed the lack of PPV-CP expression (Scorza et al. 1994, 2001). These are all characteristics typical of post-transcriptional gene silencing (PTGS) (Depicker and van Montagu 1997). The PTGS mechanism of resistance in C5 was further confirmed by the detection of short interfering RNA (siRNA) homologous to the PPV-CP sequences (Hily et al. 2005). While production of the short (21nt) siRNA has been detected in non-transformed PPV-susceptible plums

following inoculation with PPV, the resistant C5 produces both short (21nt) and long (24nt) species of siRNA. These studies lead to the conclusion that the high level virus resistance in the transgenic C5 results from the production of the long-sized class of siRNA (Hily et al. 2005; Kundu et al. 2008). Transgene silencing was the result of the activity of a hairpin DNA configuration that was apparently the result of a duplication and rearrangement during the insertion event (Scorza et al. 2010).

In 1993, a field trial of C5 and PPV-CP expressing transgenic plum lines was planted at the USDA-ARS Appalachian Fruit Research Station in Kearneysville, WV under US APHIS permit, although no PPV inoculations could be carried out due to quarantine restrictions. In order to evaluate PPV resistance, field tests were developed with research partners in Europe to test this resistant clone in areas where PPV was endemic. The field tests were conducted in Poland from 1996 to 2006, Spain from 1996 to 2012, Romania 1996–2006 (with a field test renewal granted in 2013), and Czech Republic 2002–2013. The European field tests clearly demonstrated the resistance of C5 to PPV infection through aphid vectors and by graft inoculation (Hily et al. 2004; Malinowski et al. 2006; Capote et al. 2008; Polák et al. 2008; Ravelonandro et al. 2002a; Zagrai et al. 2008a, 2008b). In all of these field tests no ‘HoneySweet’ trees were infected with PPV through natural aphid transmission. When grafted with PPV-infected budwood from susceptible hosts or grown on PPV-infected rootstock ‘HoneySweet’ trees have shown only mild symptoms in leaves localized near the point of grafting but no systemic virus spread was detected (Jarošová et al. 2010; Malinowski et al. 2006; Capote et al. 2008; Polák et al. 2008, 2012) and diminishing of localized symptoms was seen with time (Polák et al. 2008, 2012). While these graft-inoculation tests demonstrated that C5 is not immune to PPV, the virus remains confined close to the graft union with a low titer (Malinowski et al. 1998; Ravelonandro et al. 2007; Malinowski et al. 2006; Polák et al. 2008).

Both the complex structure of the inserted transgenes and the associated resistance to PPV have been found to be stable. The inserted DNA in C5 has been molecularly evaluated in both vegetatively propagated plants and seedlings and no changes have been detected (Scorza et al. 2001). In addition, expression of the resistance trait has been maintained for over 15 years of field trials with C5 clones grafted onto PPV susceptible rootstocks (Malinowski et al. 2006; Capote et al. 2008). The plants have remained free of systemic virus spread despite the very high inoculation pressure produced by grafting PPV infected material onto the transgenic shoots and grafting transgenic shoots onto infected rootstocks or in cases when the conventional rootstock became infected though aphid



**Fig. 2** Harvest of ‘HoneySweet’ plums in test plot at Kearneysville, West Virginia, USA

feeding on root sucker shoots. ‘HoneySweet’ trees have been shown to be resistant to all strains of the virus tested (Ravelonandro et al. 2001a).

Based on evaluations of fruit quality and productivity ‘HoneySweet’ is not only protected against PPV but also has the attributes of fruit quality and yield that make it suitable for commercial production (<http://naldc.nal.usda.gov/download/2915/PDF,accessed> March 20, 2013) (Fig. 2). Nevertheless, if ‘HoneySweet’ could not be used in breeding to reliably transmit high level protection against PPV to its progeny, the impact of this variety would be limited. ‘HoneySweet’ was used as a parent in crosses to evaluate the transmission of the resistance trait. Although the transgene insert consisted of an inverted repeat with duplications of certain sequences, resistance to PPV was transmitted in a Mendelian fashion as a single locus dominant trait (Ravelonandro et al. 1998, 2001b, 2002b, 2011; Scorza et al. 1998). All the seedlings carrying the transgene insert were resistant to PPV (Scorza et al. 2001). This makes resistant hybrids easy to identify as the transgene insert in ‘HoneySweet’ provides molecular markers through use of polymerase chain reaction (PCR) of the transgene itself. The presence of the linked GUS gene in the insert also allows for simple and rapid selection of resistant seedlings using the GUS histological assay (Jefferson 1987).

### The regulatory process

The commercial availability of ‘HoneySweet’ required regulatory approvals from the US APHIS, and the US Environmental Protection Agency (EPA). A voluntary submission to the US Food and Drug Administration (FDA) is also typically a part of the regulatory process for GE food products.

A substantial body of research had been developed in the years between the initial development of ‘HoneySweet’

and data submission to the US regulatory agencies which took place between 2003 and 2007. In addition to molecular characterization of the engineered plants, evaluation of resistance, and pomological studies, a series of risk assessment studies had been performed. These studies focused on the interaction of GE plums with PPV, aphid vectors, and with non-target insect species as well as gene flow. These investigations led to the findings that virus diversity was unaffected by PPV-CP transgenic plums (Capote and Cambra 2005; Capote et al. 2008; Zagrai et al. 2007, 2008c, 2011); no virus recombinants were produced (Zagrai et al. 2011; Fuchs et al. 2007); there were no measurable effects on aphid populations (Capote et al. 2008) or on other arthropods visiting the trees (Capote et al. 2007); no breakdown of PPV resistance in the presence of other *Prunus* viruses (*Prunus necrotic ringspot virus*, *Prune dwarf*, *Apple chlorotic ringspot virus*) (Polák et al. 2005a, 2005b, 2012; Zagrai et al. 2008a, b); and gene flow was quite low ([http://www.aphis.usda.gov/brs/aphisdocs/04\\_26401p.pdf](http://www.aphis.usda.gov/brs/aphisdocs/04_26401p.pdf)).

Pre-submission consultations with US regulatory agencies APHIS, FDA and EPA began in 2003 (Scorza et al. 2013). These consultations are not typical of many national regulatory systems but they are useful to applicants in preparing a submission that clearly addresses the regulatory requirements. APHIS has jurisdiction over the field testing of genetically engineered plants that contain plant pathogen genes or promoters. FDA has jurisdiction over GE plants used as food, and EPA regulates GE crop plantings of over ten acres for GE plants that produce molecules that protect plants against pests—protection against PPV in the case of ‘HoneySweet’. An application for determination of non-regulatory status was submitted to APHIS in September 20, 2004. A revised application was submitted on March 13, 2006 based on APHIS comments. In May, 2006, the petition submitted to APHIS was posted on the internet for 60 days of public comment. APHIS received 1,725 comments, 1,708 were not in support of deregulation. A large number of comments of non-support appeared to have been duplicated, cut and pasted, at the urging of a single anti-GMO website. APHIS addressed the comments and a determination of non-regulated status was made on June 27, 2007. The result of an Environmental Assessment undertaken by APHIS was a Finding of No Significant Impact ([http://www.aphis.usda.gov/brs/aphisdocs2/04\\_26401p\\_com.pdf](http://www.aphis.usda.gov/brs/aphisdocs2/04_26401p_com.pdf)).

The dossier provided to the FDA consisted of information pertaining to the food uses of plum, compositional analyses of ‘HoneySweet’ compared to non engineered plum varieties, and in silico analyses of allergenicity and antinutrient potentials. Several databases and alignment approaches were used including the Allermatch allergen finder ([www.allermatch.org](http://www.allermatch.org)), 7 and 8 amino acid word

search using the same database, 80 amino acids sliding window alignment with the same database, and FASTA alignments done manually using the Codex Alimentarius guidelines which were used to create the Allermatch algorithms. The sequence was broken into 80 amino acid words and FASTA aligned with allergens ([http://www.who.int/foodsafety/publications/biotech/en/ec\\_jan2001.pdf](http://www.who.int/foodsafety/publications/biotech/en/ec_jan2001.pdf)). The antinutrient potential of the insert sequences was evaluated using the NCBI antinutrient sequence data base. The submission to FDA was made on October 26, 2006 and was accepted on January 12, 2007. Following several requests for additional information or clarifications a communication was received from FDA on January 16, 2009 stating that, “Based on the safety and nutritional assessment USDA-ARS conducted, it is the understanding of FDA that USDA-ARS has concluded that plums derived from the new variety are not materially different in composition, safety, and other relevant parameters from plums currently on the market and that the genetically engineered plum line C5 does not raise issues that would require premarket review of, or approval by, FDA.” This letter indicated the completion of the FDA review.

A dossier was submitted to EPA in June, 2007. The initial EPA scientific review resulted in a request for additional information and/or clarifications and responses were submitted in July 2008. On October 29, 2008 EPA published in the Federal Register (73 FR 64325) a Notice of Receipt announcing an application to register a pesticide product containing a new active ingredient not included in any currently registered pesticide product (the PPV-CP gene). Four public comments were received during a 30 days comment period following the publication of the notice, all favorable.

EPA published a notice of filing of the petition in the Federal Register on November 14, 2008 (73 FR 67512) and the public was given a 30 days comment period. EPA received no comments on this notice. EPA required an independent laboratory validation of the proposed method for detecting the transgene in ‘HoneySweet’ leaves. The leaf samples along with the detection method were sent out for third party validation. On April 1, 2010 the draft registration was published on the web (<http://www.regulations.gov/#!docketDetail;D=EPA-HQ-OPP-2008-0742>, accessed March 21, 2013) with a comment period ending on April 30, 2010. Sixty-six comments were received; sixty-four were highly supportive of registration, including some questioning the need for registration and the classification of ‘HoneySweet’ plum as a biopesticide. These questions were raised with regard to the fact that the mechanism of resistance does not produce a plant incorporated protectant since no CP is produced and DNA or nucleic acids have never been considered alone to be pesticidal substances. The labeling of trees as pesticidal was also brought into question. It was suggested that mandatory labeling of ‘HoneySweet’ trees and propagative

material as pesticidal (fruit would not be labeled) would cause substantial damage to the market for ‘HoneySweet’ and sets a precedent for future transgenic virus resistant crops to be treated “in the same unscientific and irrational manner.” (for specific comments cited see <http://www.regulations.gov/#!docketDetail;D=EPA-HQ-OPP-2008-0742>, accessed March 21, 2013). EPA issued an unconditional Section 3 registration on August 8, 2011. At this point ‘HoneySweet’ had successfully completed the US regulatory process, the first woody perennial tree fruit to have done so.

### Future prospects for PPV resistance through GE

A number of other programs world-wide have produced PPV resistant herbaceous species or plums using RNAi technology (see review of Ilardi and Di Nicola-Negri 2011). Much of the work has involved hairpin constructs of the PPV-CP gene (Hily et al. 2007; Di Nicola-Negri et al. 2010; Dolgov et al. 2010; Mikhailov and Dolgov 2007; Wang et al. 2009).

At this point in the research and development of RNAi technology for PPV resistance additional research in the transformation and regeneration of *Prunus* species is necessary for the broader application of this technology. Although some successes have been reported (Dai et al. 2004; Damiano et al. 2007; Espinosa et al. 2006; Gentile et al. 2002; Padilla et al. 2006; Petri et al. 2008; Ramesh et al. 2006; Song and Sink 2006; Tian et al. 2007; Urtubia et al. 2008) there is still much work to be done to develop reliable, productive *Prunus* transformation systems. The ability to transform and regenerate from clonal material versus seed-derived explants would be an important step and allow the rapid incorporation of virus resistance into existing varieties. Dolgov et al. (2010) report a successful example of developing PPV-CP RNAi plums from leaf explants of the cultivar ‘Startovaya’.

Silencing of multiple targets in the viral genome would provide broader-based horizontal resistance. Work with a number of targets such as P1, HC-Pro, P3 (Di Nicola-Negri et al. 2010) and with artificial micro RNAs (Ravelonandro et al. 2013) has demonstrated the feasibility of this approach. RNAi silencing of the host factor eIF(iso)4E in plum presents an example of an alternative RNAi target for developing host plant resistance to PPV (Wang et al. 2013). Further refinements such as combining RNAi-induced resistance with other resistance mechanisms, natural or GE, can provide a further level of security in terms of the durability of protection.

### Conclusions

The approval of ‘HoneySweet’ in the US has marked a milestone for the practical application of GE technology

for the improvement of temperate fruit trees. We have, through international cooperation between public institutions in six countries, utilized genetic engineering to develop resistance to a major pathogen of a woody perennial fruit crop, taking the project from concept to a product that has passed regulatory scrutiny in the US.

We are currently hybridizing ‘HoneySweet’ with a range of cultivars from different *P. domestica* growing areas to develop new adapted resistant cultivars. These new cultivars derived from ‘HoneySweet’ will not require additional regulatory approval in the US. We are accelerating the breeding process using ‘FasTrack’ breeding which utilizes the Poplar *Flowering Locus T* (*PtFT*) gene (Böhlenius et al. 2006; Zhang et al. 2010) (Fig. 3). *PtFT* transgenic early flowering parental lines reduce the generation time from 4 years to 1 year (Srinivasan et al. 2012; <http://ucanr.edu/sites/fastrack/>, accessed March 19, 2013). We have also produced new PPV resistant plum lines silencing CP (Hily et al. 2007) and other PPV genes and these plants are currently under test.

We believe that ‘HoneySweet’ presents an important step in the utilization of genetic engineering to help solve major virus diseases of fruit trees. The approach documented by the research and development effort used to produce ‘HoneySweet’ has been shown to be effective, durable, and safe as a food and in the environment (CERA 2012).

Regulatory and acceptance barriers to the release of GE virus resistant fruit crops exist and these are particularly evident in the EU. Over the past 15 years we have conducted a number of studies on environment risks and food

safety in the EU and these studies have consistently demonstrated the safety of ‘HoneySweet’ plum, and by extension the technology used in its development. Current technologies have allowed DNA and small RNA sequencing of ‘HoneySweet’ (Callahan et al. 2010; C. Dardick, A. Callahan, T. Malinowski, unpublished) and these studies confirm prior safety assessments. Gene flow studies conducted for over a decade demonstrate the potential for coexistence of GE and conventional plums (Scorza et al. submitted). We look forward to regulatory approvals of ‘HoneySweet’ in other regions affected by PPV, and the development, testing and regulatory approval of new GE PPV-resistant cultivars from other genetic improvement programs. The efficacy, durability, and safety of ‘HoneySweet’ plum in the protection against PPV establish the practical advantages of RNAi technology for developing virus resistant crops and warrant its further application for protecting agricultural production. To accomplish this, research must move from the laboratory to the field and through the regulatory process. This is the real challenge to the technology.

**Acknowledgments** The authors wish to acknowledge the following persons and organizations that have contributed scientific expertise or otherwise supported the ‘HoneySweet’ research and development effort: A. Atanassov, J. Dougherty, L. Fortis, L. Georgi, J. Kumar, Black Sea Biotechnology Association, USDA-Foreign Agricultural Service, G. Llacer (Spain), B. Zawadzka (Poland) and N. Minoiu (Romania) who initiated ‘HoneySweet’ field tests in Europe. The field test in Spain was initiated under EU-BIOTECH FP4-“Risk assessment of genetically engineered woody plants expressing virus coat protein gene” (1996–1999). Studies undertaken in the Czech Republic were supported by the Czech Ministry of Agriculture, Grants No. QI101A123, and No. 0002700604 and in Romania by EU contract “TRANSVIR”-QLK3-CT-2002-02140 and by the Romanian Research Ministry, contract 37/2003.

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**Fig. 3** Poplar *Flowering Locus T* (*PtFT*) transgenic early flowering *P. domestica* plum line in the greenhouse hybridized with ‘HoneySweet’ for rapid incorporation of the ‘HoneySweet’ resistance insert into new *P. domestica* germplasm and cultivars

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