

RESPONSE TO DEFRA GM COEXISTENCE CONSULTATION

FROM A MEETING HELD AT CORNWALL COLLEGE, NEWQUAY, 11TH OCTOBER 2006

Background to meeting.

This meeting was organized as part of the activities of an ESF funded project, SME Skills in Applied Zoology, which aims “to increase the skills necessary in Cornwall to protect, manage and interpret the natural environment”. Cornwall College, Newquay is part of Duchy College and the consultation drew on Duchy’s strong agricultural links, including its Organic Studies Centre.

The meeting had 3 main aims:

- 1) to contribute to an increased understanding of issues related to GM coexistence in Cornwall.
- 2) to establish / strengthen links between parties interested in following GM issues and in taking part in further consultations over draft regulations.
- 3) to contribute to the consultation exercise with submission of initial concerns, general considerations and specific issues arising. (The aim was not to cover all aspects of the consultation; rather it was to draw attention to particular points that emerged during discussion.)

The meeting began with a background to GM issues and Defra’s GM coexistence consultation document, delivered by the Facilitator. It was based on the presentation Gundula Azeez (Policy Advisor, Soil Association) would have given if illness had not prevented her attendance. Most of the meeting consisted of discussion of points raised by the introduction and the consultation document, as well as GM issues more generally.

Initial Concern.

There was a strong feeling that the consultation represented “GM by the back door”. It flies in the face of opposition to GM from the general public. The strength of such public opposition has been acknowledged by UK supermarket chains in almost universally providing GM-free products. As a participant said “We have said a resounding “No” to GM, why are we being consulted on mechanisms to allow it?”

General Considerations.

- GM is a relatively young technology attempting to exploit a complex evolving system (the natural environment). Neither the technology nor the system are adequately explored, let alone fully understood. In such circumstances it is vital to employ the precautionary principle¹, i.e. we should not go ahead with a new technology, or persist with an old one, unless we are convinced it is safe.
- The UK has the opportunity to remain GM-free. Once this position is relinquished it cannot be regained. It should not be abandoned lightly.
- The guiding principle in considering the impact of GM crops on conventional and organic agriculture must be that *the polluter pays*.
- GM may have potential to deliver significant advantages in the future. Were these to become apparent, and change the balance of costs and benefits, coexistence could be revisited.

Currently, the potential costs of GM heavily outweigh its documented benefits.

¹ **Footnote:** The Joint Nature Conservation Committee is the statutory adviser to Government on UK and international nature conservation. It states “The Precautionary Principle is one of the key elements for policy decisions concerning environmental protection and management. It is applied in the circumstances where there are reasonable grounds for concern that an activity is, or could, cause harm but where there is uncertainty about the probability of the risk and the degree of harm.” (<http://www.jncc.gov.uk/page-1575>)

Specific Issues.

A) Thresholds.

The consultation document is confusing in places because both 0.9% and 0.1% criteria are used.

The 0.9% criterion reflects the minimum detectable level when EU policy was being framed. However, this level has now fallen to 0.1%.

Replacing a set figure with the phrase “current minimum detectable level” will “future proof” legislation in an area of rapid technological development and ensure best practice.

The 0.9% criterion must be replaced throughout with “current minimum detectable level”.

B) Separation distance.

Other bodies have recommended considerably larger separation distances than suggested in the consultation. For example, separation distances recommended by the National Pollen Research Unit are 30 to 140 times greater than proposed in the consultation (5km v. 35m for oilseed rape, 3km v. 80m or 100m for maize). NPRU recommend 1km and 500m for sugar beet and potato, whereas the consultation makes no proposals for these two crops (source: Soil Association).

For separation distances to minimise contamination of other crops, they must

- 1) be large enough to reflect uncertainty in what is adequate separation (uncertainty arises through paucity of data and local differences in topography, microclimate and pollen vectors).
- 2) employ the precautionary principle.

In addition:

- a) The onus must be on the GM farmer to create the separation distance.
- b) The distance should be to the GM farmer’s field boundary. It must not include features such as crop headlands on neighbouring farms.

Separation distances must be at least those recommended by the National Pollen Research Unit.

C) Notification.

There is potential for contamination of species related to the GM crop on smallholdings, allotments and gardens – and in consequence the destruction of the genetic integrity of heritage and other significant varieties grown there. GM farmers must notify all owners of neighbouring land, not just other producers.

It must be a statutory requirement for GM farmers to notify all owners of neighbouring land.

D) Desirable measures.

Such measures are important enough to be statutory, with opportunity for periodic review.

E) Monitoring.

Defra must define “effectiveness” and publish the criteria. They must also monitor for 3 years after the regime has achieved effectiveness.

Defra must monitor the effectiveness of the coexistence regime.

F) Transport.

Issues related to transport of GM crops and biosecurity generally are not adequately covered in the consultation document.

There must be statutory requirements on hauliers to ensure adequate containment during all transport of GM crops and seed (including farm to farm) and also in the event of accident. The cost of implementation must be borne by the transporter.

Statutory requirements to ensure containment of GM crops and seed during all transport/accident

G) Financial compensation.

The full cost of compensation is not simply the value of the crop but must include:

- 1) damage to the commercial prospects (brand damage) of the contaminated producer, e.g. through loss of organic status and associated loss of trust/credibility.
- 2) costs associated with regaining former status, e.g. regaining organic certification through re-conversion.

The GM farmer and seed supplier must be liable for the full cost of GM contamination.

H) GM-free zones.

Note that such zones already exist – Cornwall (and Penwith district council within Cornwall) and Devon have declared themselves GM-free zones – such zones are the obvious first port of call for farmers interested in establishing voluntary GM-free zones.

Recognize current GM-free zones and give legal status to all such zones

I) Seed source.

It is essential to prevent any contamination of seed. Clean seed is at the start of the production chain and the lack of sources of clean seed will prevent organic producers achieving minimum detectable levels of GM contamination.

Institute a statutory requirement for supply of clean seed

Peter McGregor on behalf of the meeting attendees 11/10/06

Attending:

Martin Davies, Technical Development Officer, Organic Southwest

Georgia Davis, Smallholder volunteer

Peter Hall, Farming Editor, Western Morning News

Lavinia Halliday, Organic beef & sheep farmer

Peter McGregor, SME Skills in Applied Zoology, Duchy College

Jane Michell, Organic Studies Centre, Duchy College

Andrew Ormerod, Economic Botany Researcher, Eden Project

Simon Ormerod, Smallholder

Stephen Roderick, Organic Studies Centre, Duchy College

Attending as an observer:

Matthew Heaton, Advisor, Natural England

Involved in initial discussions, but unable to attend on day:

Gundula Azeez, Policy Advisor, Soil Association

Colin Pringle, Cornwall College, Newquay

Janet Simmons, Organic Farmer



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