

Please take account of my comments regarding the GM Scoping Note.

The framework that is being suggested is fundamentally flawed.

It is outrageous bias to presume benefits for GM crops and then try to set them against the 'hypothetical' risks of environmental damage. None of the supposed benefits of GM crops have actually materialised in the UK. Even the crop - GM oil seed rape - being promoted as a way of cutting down on herbicide use is failing to live up to its promise. The farmer with the biggest single field acreage of GMOSR in the UK (at Munloch) told me personally that growing the GM crop had not reduced his use of herbicide. It should also be noted that this herbicide use included an autumn application of glyphosate, which is not normally permitted because of the increased rate of leachate and in this case the leachate drained straight into the food-chain of over-wintering birds in the Munloch Bay SSSI.

In the US the emergence of superweeds now necessitates use of even more toxic chemicals that I understand are presently banned in the UK. Monsanto is pushing for permitted herbicide residues in soybeans, for example, to be legally raised - surely not an indication of reduced use?

We already have the environmental costs in terms of superweeds and inappropriate use of toxic chemicals. Where are the presumed benefits?

The assumption that only 'some people' are concerned about 'unforeseen consequences' is far short of the mark given that opinion polls have shown that the majority of the population would prefer to avoid them to guard against potential health risks, and in fact are voting with their purses accordingly. Should we not first we clarify what proportion of the population would like their government to disavow the precautionary principle?

It is anyway invidious to attempt to perform a conventional cost/benefit analysis when the truth is that we simply do not know what the long-term consequences will be. What we do know is that GM constructs can be passed on, for example, into wild crop relatives and into the bacteria that inhabit the human gut. We do not know the extent to which they may be passing into soil bacteria and disrupting fundamental interactions. We do however know that GM constructs are self-replicating rather than self-limiting and once released cannot be recalled.

Conventional risk analysis is totally inadequate for the assessment of complex living systems so the reality is that any decision to go ahead with the commercialisation of GM crops is going to be made on the basis of guess-work rather than informed scientific advice.

In terms of priority of categories, I would like to point out that the 'environment' can hardly be ranked in numerical order with the likes of the biotech industry and the rural economy. The environment happens to be our fundamental life-support system ie the food we eat, the air we breathe and

the water we drink. It is the category from which the others may be derived and as such has to receive the highest rating.

If we cannot quantify the environmental risks of GM crops how are we to rate the economic implications? The whole GM enterprise is simply the signing of a blank cheque to the GM corporations. In Canada farmers are being ruined for having the temerity to 'permit' their neighbours GM fields to pollute their own, thereby incurring enormous fines. What is to stop the same thing happening here? Who is to compensate organic farmers for losing their livelihood? Organic standards agencies will not drop their standards because consumers will not let them, and the UK is too small for GM crops and organic crops to co-exist. And these are only the clearly foreseen costs. What about the unknowns?

The discussion about the commercialisation of GM crops needs to take place within a much wider framework than that proposed. This wider framework not only needs to give full consideration to the option of no GM crops, but needs to consider what kinds of agricultural system would be truly sustainable. We need a system that nourishes and conserves the soil, produces healthy food free of toxic chemicals, encourages wildlife and sustains more people on the land within a flourishing rural economy. So the GM discussion should also be including a full consideration of organic farming as the alternative way forwards.

The matter of long term ecological sustainability is too important to be determined in a study that is not only limited in breadth but also in financial commitment. Please start again and fund this study properly.

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