

Highlands and Islands GM Concern

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GM Crops Team
Prime Minister's Strategy Unit
Cabinet Office
4th Floor Admiralty Arch
The Mall
London
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Dear Sirs

The costs and benefits of genetically modified crops HIGMC comments on scoping paper

Highlands and Islands GM Concern (HIGMC) is a community-based group of over 400 active participants in northern Scotland concerned about the introduction of GM crops, food and other products. The group has been the main forum for the debate around the GM FSE farm trials in Scotland and has worked with AEBC, Scottish Executive, Highland Council and many other statutory bodies to ensure that local and community views are reflected in the decisions on the take-up of GM in Scotland.

HIGMC recognises the need for a detailed assessment of the costs and benefits of GM - and we have consistently asked for this to be done **BEFORE** GM trials commenced – so we welcome this type of study taking place. However, the ideas contained in the scoping paper indicates that many major amendments to the methods proposed are needed if this study is to provide an informative, balanced and trusted assessment of the impacts and likely outcomes of deciding to commercially plant GM crops in the UK.

Before listing the weaknesses and gaps we wish to see amended, we should draw your attention to work recently carried out in Scotland to assess the socio-economic impacts of GM commercialisation in the UK. This work was recently presented to the international IFgene conference in Edinburgh by its lead researcher Professor Clive Spash of the Macaulay Institute, Aberdeen. This EU funded research uses a far better approach than the one proposed for your study: it is truly independent and not politically led; it incorporates social as well as economic factors, and it addresses a range of issues generated by those directly involved in GM (farmers, researchers, consumers and regulators) rather than relying on 'experts' and advisers who do not themselves have to consider the impacts that GM may have on their business, community or own lives. We strongly recommend that you contact the Aberdeen research team and think about how to bring their scope, methods, participation and impartiality to bear in your own study.

In response to the scoping of your own cost-benefit analysis, our main comments are:

- **False assumptions:** The report must not make false assumptions that there will be no environmental impacts or costs because Ministers will not allow environmentally unsafe releases (5.10). Similarly, the assumption that there will be no potential costs arising from food safety is false – the public costs of dealing with the BSE and FMD crises were unforeseen and ignored because similar false assumptions were made based on incomplete understanding of the potential impacts at the time and over-reliance on regulatory controls that proved to be inadequate.
- **Untested legal assumptions:** the proposal also makes false legal assumptions on untested interpretation of EU law. The scope of "socio-economic and ethical factors" in the new GM release Directive is not yet determined, and may extend the remit of responsibility for GM release impacts. The assertion that organic farming standards permit 1% GM contamination does not appear in the EU organic standards regulation, which says that organic food must not include GM or GM derivatives. Whether the GM deliberate release directive over-rides the organic directive has not been tested in court. The decision on whether organic food may or not be contaminated to threshold

levels by GM could affect the cost to organic growers (or GM farmers paying compensation) by £bn's.

- **Zero base scenarios:** the scenarios tested must include not only a “no GM” scenario in which GM is not grown in the UK, but also a “GM free” scenario in which the costs of removing GM contamination from all foods are included. This option should be included both because the public debate may indicate consumers do not wish to eat *any* GM in their food, and because it forms the starting *baseline* against which the impacts of different levels of GM use need to be compared.
- **Devolved outcomes:** the study should present separate scenarios and impact assessments for devolved administrations. GM commercialisation is a devolved matter that will be decided in the Scottish Parliament and the study must enable Scotland and other countries to identify the impacts in their own area and make reasoned devolved decisions. A Scottish set of scenarios and outcomes must be included and separate results for each devolved administration made clear.
- **Different conditions:** devolved outcomes must reflect not only different climates and crop potentials, but also different farm systems. For instance, GM OSR will likely displace mixed farm rotations in Scotland leading to different environmental impacts to those seen in East Anglian arable systems (a change to GM all-arable rotations will lead to soil structure deterioration, weed build-up and loss of carbon sequestration capacity) and different farm economic effects (GM OSR crusher waste is not approved for feeding to cattle due to remetalolite toxicity in ruminants, so cattle farmers will have to buy more feed). A single set of ‘UK’ farm conditions and structures will fail to reflect the reality if take up and impact in different parts of the UK.
- **Precautionary principle:** the assessment should openly acknowledge uncertainty and the limits of GM control - during the 3 years of FSEs in Scotland, we have seen “impossible” gene transfers occur and “carefully self-regulated controls” ignored. Scientific and ‘expert’ predictions based on current limited knowledge must not be used as concrete foundations for scenarios. The range of outcomes must have a confidence limit attached to them and an analysis of sensitivity for major variables clearly shown. The report must err on the side of caution and use the precautionary principle in making its conclusions.
- **Community input:** the impact assessment must be based on the general public’s reaction to GM, reflecting likely consumer demand for GM and community reaction to GM in their area, rather than being based on industry projections and ‘expert’ advice. The use of demand figures that are a projection of public opinion surveys on eating GM food are better indicators of demand than industry projections of demand for their own products which will always be inflated and over-optimistic.
- **Developing countries:** the study should not factor-in the impacts of GM grown in the UK and eaten in developing countries. This is a UK study: developing countries should be left to make up their own minds. The report should not seek to offset UK ‘costs’ against conjectured overseas ‘benefits’.
- **Omissions:** the lack of any mention of liability for GM shows a serious lack of awareness in the scoping document. Whether government takes responsibility, GM farmers pay insurance premiums, biotech companies put up bonds or impacted third parties have to absorb the costs, there are liability responsibilities attached to growing GM which must be costed-in.

In conclusion, we think that the scoping of this study is incomplete and ask to see these and other issues addressed, followed by re-consultation on the revised proposals, prior to commencement. There appears to be no reason why such a short and hastened timetable has been set for this study and additional time should be taken to get real stakeholders (farmers, retailers, community representatives and food consumers) to set the agenda and range of issues to be addressed.

The study describes 23 potential benefits of GM to be measured and talks about them with certainty. It lists only 6 potential costs and describes them only as ‘public concerns’ each followed by a question mark. This does not indicate a balanced approach or one that is informed by the real issues of public debate about GM, and needs to be radically rethought.

Can you please keep us informed of the progress of the study and include HIGMC as a key stakeholder to be involved at all stages of the study. We look forward to receiving an account of how your revised proposal reflects the issues that we and others have raised. We would also ask that one of the study seminars be held in Scotland and real stakeholders be invited to participate.

Yours sincerely

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Director, HIGMC

cc. Malcolm Grant, AEBC
Ross Finnie, Scottish Executive