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Mavis Young

October 24, 2002

Prime Minister's Strategy Unit
Cabinet Office, 4th Floor Admiralty Arch
The Mall
London
SW1A 2WH

Dear Sir or Madam:

I would like to express my views on GM free crops in the European Union.

European sources inform me that the risk assessment standards are so strict that they would disqualify any present product applications. Proposed new rules will be so strict that many U.S. products, such as animal feed, will have to be labelled. So, not only will the moratorium remain, but loopholes that currently allow some engineered food to slip into Europe will be tighter, making it harder for U.S. agribusiness to sell products there.

Those rather important issues aside, again it is the members who will determine whether to approve or reject any new biotech food products. But the six-- France, Italy, Denmark, Austria, Greece and Luxembourg -- that played pivotal roles in launching and maintaining the moratorium still want the labelling and traceability laws in place before they'll budge.

Problem is, those conditions haven't been met. And there is also the issue of liability, which, Goerens statement aside, somehow got lost in all this. Who is going to take responsibility for transgenic contamination of organic and conventional food and crops?

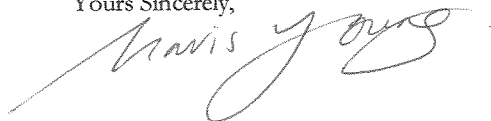
Agriculture ministers, if they didn't understand this after reading the Soil Association report on the near impossibility of agricultural biotechnology co-existing with conventional and organic farming, certainly got the grassroots message on Monday. That's when 300 farm, consumer and environmental organizations, representing the interests of millions of people (i.e., not agribusiness corporations), went to the Luxembourg meeting of EU agriculture ministers to demand that laws require labelling of seed packages as genetically modified if PCR tests reveal transgenic organisms in more than 0.1 percent of a sample. This is the de facto standard used now, and seed companies are meeting it.

The proposed Seed Directive would allow for organic and conventional seed to contain more transgenic material than that - anywhere from 0.3 to 0.7 percent depending on the plant type - without being labelled. European farmers are understandably concerned that this could lead to them unwittingly sowing the seeds of genetic contamination of the food supply. Once sown, those seeds would sprout into plants that pass their transgenic traits into surrounding fields.

But these questions of the moratorium and whether or not it's lifted might make one forget that the Europeans do not want genetically modified food. Eighteen biotech seed varieties were approved before the moratorium began. Yet, only one of them is planted, in Spain.

Moratorium or not, the biotech industry likely will remain shut out of Europe for the foreseeable future.

Yours Sincerely,



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Dear Sir or Madam:

I would like to express my views on the "Scoping note".

The Scoping note talks about the benefits of GM but these are, of course, entirely hypothetical. It talks, for instance, about benefits for farmers that include:

- * Stress & disease resistant plant lines;
- * Low input crops, e.g. decreased nitrogen requirement therefore lower production costs;
- * Higher yields;

Sounds great, but the crops that are close to commercialisation offer none of these benefits!

Surely, it would make more sense to consider commercialisation on these grounds when such benefits were demonstrably available - not when they're demonstrably not!

The same applies for the benefits projected for consumers and society at large:

- * Lower product prices;
- * Better quality food;
- * Reduced likelihood of contamination with toxins and biocides.

- * Low environmental footprint crops and farming systems;
- * Availability of renewable raw materials;
- * Stronger rural economy;
- * Benefits to biodiversity!

This is sheer fantasy. There is no clear evidence that any existing GM crops can deliver any of these benefits. If anything, the reverse.

It's rather like being asked to consider whether to commercialise nuclear power plants that are less efficient than existing conventional power plants and staggeringly more hazardous than alternative energy sources, on the basis that they are projected to produce electricity that will be too cheap to meter at some undefined point in the future.

It's clearly absurd to assume that all the benefits that are projected for GMO's by their proponents will be realised.

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Far more realistic would be to base any decision on the actual "benefits" that have accrued so far (eg higher costs, lower yields, lost markets etc.

It also fails to ask to what extent these benefits could be delivered by alternative means without the risks, e.g. via biotechnology without genetic engineering (through Marker Assisted Breeding, for instance)

Predictably, the concerns section (2.3) is short, hesitant and vague:

"For some people, there is also concern that the introduction of GM crops might lead to unforeseen and unintended consequences that are not even being considered as yet."

This sounds wonderfully vague but ignorance is so much the name of the game with this technology that unforeseen problems are a racing certainty (as some of the more honest proponents are prepared to admit), though obviously hard to cost.

Most of the concerns that are listed are posed as questions - what a contrast! The benefits can be assumed but the hazards are uncertain and/or are those of only "some people".

* Are GM foods safe to eat?

* Would GM crops have an adverse effect on the environment?

* How will the implications of UK decisions be affected by decisions on commercial growing of GM crops in other countries?

The Scoping note also assumes that GM crop production on a commercial scale is likely to go ahead everywhere else in the world. This is very unlikely to be the case - witness how isolated the UK is at the moment in Europe over GM food labelling and in its drive to lift the moratorium.

And if the report is limited to examining what effect GM commercialisation will have on the UK, why will it include its projected impact in developing countries?

"Agricultural biotechnology, including GM crops, may not represent a silver bullet, but this technology does have the potential to improve agricultural production which is a component of the broader challenge of food security."

Why do we have to include a hazardous technology - GE - within this broader category? We can have modern biotechnology (MAB etc.) without GE.

Clearly the inclusion of this consideration is intended to create the sense of a moral imperative for the UK to grow GMO's, i.e. in order to feed the hungry. Once again, there is no consideration of the other (proven!) alternatives for doing this.

The section on costs (5) is shambolic & full of false assumptions. For example, it says, "growers will only choose to produce GM crops if there is a demand for GM products" but the US's loss of export markets for its crops show that farmers can be fooled by hype only to discover the full consequences of their actions, particularly when subsidies and dumping are used to disguise the impact of market loss.

In my view, the "Scoping Note" is outrageously biased and I hope that you will consider the other arguments.

Yours Sincerely,



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Dear Sir or Madam:

I am writing to let you know my views on subject of "Cost and Benefits" in the UK Government's scoping note which is part of the Government's consultation on GM Crop commercialisation.

The PM's Strategy Unit's Scoping Note is confused about the function of the SU study. It fluctuates dramatically between two interpretations of "Cost and Benefits".

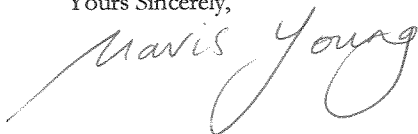
On one hand, "Cost and Benefits" is a loose metaphor for a collection of views on the consequences of growing GM crops in the UK. In this interpretation, the point of the SU study will presumably be to help increase the awareness with out necessarily pointing towards a conclusion whether GM crops should be grown in the UK.

On the other hand, the notion expressed on page 19, the SU is some how to quantify these "costs and benefits" and "Weight each of the categories of costs and benefits identified in the report" suggest that the SU is not talking in Metaphors when it uses the words "Cost and benefits". If this interpretation is to be followed then the SU's work will not be compatible with the precautionary principle, nor with serious respect of the uncertainties of "Unforeseen and unintended consequences", nor with the Government's commitment to commercial GM cropping's having no significant environmental costs.

As the historical record of cost - benefit analysis has shown the result is less likely to facilitate than to polarise and make more difficult the "Open and transparent" public debate into which the SU review is intended to feed.

The well argued NGO attempt to "Reframe the GMO debate in a development context" by emphasizing questions of power, rights, food security, precaution, exploitation and the historical realities of particular routes of poor people would be seriously compromised by any attempt to fit it into an SU study guided by this second interpretation of "Cost and benefits."

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