



GM-FREE FOOD AND FARMING

PRESENTATION TO THE JOINT OIREACHTAS COMMITTEE ON AGRICULTURE, FISHERIES AND FOOD

By Michael O'Callaghan
Co-ordinator, GM-free Ireland Network
2 July 2008

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ATTACHED DOCUMENTS:

Map of GM crop cultivation around the world in 2008.

Facts and figures about genetically modified organisms.

Flaws in the EU authorisation process for GMOs.

Environmental and health impacts of GMOs: the evidence.

The social and economic impacts of GMOs.

GM crops around the world – an accurate picture. GM Freeze, June 2008.

Feeding the world with GM crops: Myth or Reality. GM Freeze, June 2008.

The rise of animal feed prices and potential impacts in the EU: causes and links to GM policy. FOE, Dec. 2008.

EU animal feed imports and GMO policy. CPE / FOE / Greenpeace, May 2008.

Greenpeace letter to Heads of State and Governments on the food price increase, 16 June 2008.

GMO Approval procedure and zero tolerance regime and the economic consequences thereof:

EU Parliament Committee on Agriculture and Development, ASP, A3E-2:

exchange of views with experts: statement by Jochen Koester, Geneva.

Excerpt from the "Executive Summary of the Synthesis Report of the International Assessment of Agricultural Knowledge, Science and Technology for development (IAASTD).

Who will feed the world? Towards diverse, sustainable forms of agriculture as drivers of sustainable development. Greenpeace briefing.

Solving the global food crisis. Media briefing, FOE, May 2008.

EU food agency under fire as Commission debates GMOs - FOE / Greenpeace, 7 May 2008.

Commission vote of no confidence in EU safety authority - Greenpeace statement, 7 May 2008.

Open letter to support DG Environment's reported proposal on the cultivation of genetically modified maize cultivars in the European Union.

Greenpeace reaction to June FAO declaration — 6 June 2008.

Farming with nature, farming for life, by Gerd Leipold, Executive Director, Greenpeace International.

Economic Impact of Unapproved GMOs on EU Feed Imports and Livestock Production — DG Agri report

Growing debate on GM. Ann Cahill, Irish Examiner, 27 June 2008.

Aarhus Convention: list of documents + letter to party concerned re. communication ACCC/C/2006/17

+ related finding of Compliance Committee on applicability of the Convention to the Republic of Ireland.

A. PROCEDURAL ISSUES

1. NEED FOR FAIR AND BALANCED PUBLIC PARTICIPATION

We are alarmed that this Joint Oireachtas Committee has prevented a fair and balanced discussion on GM food and farming issues.

The Committee has invited 7 representatives from the side which opposes the Government's policy on GMOs, and only one from the side which supports it.

The Committee Clerk, Ms. Josie Briody, informed us that the invited speakers were to include representatives from Monsanto, Syngenta, the Irish Grain and Feed Association, Teagasc, TCD / European Action on Global Life Sciences lobby group, and 2 pro-GM scientists from UCC. All of these groups either sell, use, or promote GM food and farming:

- Dr. Patrick O'Reilly, Manager, Monsanto Ireland;
- Syngenta: TBA (since then decided not to participate);
- Irish Grain & Feed Association — which has already given at least one presentation to the Committee earlier this year (now apparently not participating);
- Prof Jimmy Burke from Teagasc. Note that Teagasc has spent over 10 million euro of exchequer funding for research and development on GM crops. Moreover, which will host an international conference promoting GM seeds and crops from 24 – 27 August at UCC, on behalf of a Canadian biotech industry front group called the Agricultural Biotechnology International Conference (ABIC) Foundation, managed by Ag-West Bio Inc. and funded by Monsanto. ABIC's Board of Directors includes Jimmy Burke (the former head of Teagasc Crops Research), the conference chair Ashley O'Sullivan (a former Monsanto employee), Roger Kemble (President of Syngenta Biotechnology Inc), and Malcolm Devine (former employee of Aventis CropScience and Bayer CropScience!);
- Prof David McConnell from EAGLES (a task force of the European Federation of Biotechnology - www.efbweb.org - whose members include Monsanto Europe, the Association of German Biotech Companies, the Biotechnology Industry Organisation (USA), etc.
- Dr. Charles Spillane from UCC Dept of Biochemistry (who has the Canadian government agent and Fine Gael GMO adviser Shane Morris in his lab): www.ucc.ie/spillane/pages/members.html
- Prof. Fergal O'Gara from BIOMERIT Research Centre, UCC Dept of Microbiology (which is developing GM soil bacteria): www.ucc.ie/biomerit

But on 19 June, the Committee invited only 1 or 2 representatives from the GM-free Ireland Network to participate in the discussion. GM-free Ireland is an unincorporated umbrella group representing 130 diverse organisations which support the agreed Programme for Government to declare the Island of Ireland as a GMO-free crop zone and protect the reputation of Irish beef and dairy exports by encouraging the use of certified non-GMO animal feed. Note that this group has the largest number and broadest diversity of stakeholders of any NGO in Ireland; its members (together with the populations of the 19 Local Authorities which have declared their areas to be GM-free zones) represent over 1 million citizens; and many of them depend on their ability to produce the safe GM-free conventional and organic food which the vast majority of EU retailers and consumers demand.

This imbalance is particularly onerous in view of the fact that despite 20 years and millions of Euro worth of research and development, only 0.2 per cent of the world's agricultural land is cultivated with GM crops. By this token, the Committee should have invited 698 speakers to represent the pro-government side of the debate!

Your failure to allow a balanced discussion is a totally unacceptable abuse of Oireachtas procedure.

The Committee's refusal to co-operate

Michael O'Callaghan asked the Committee Clerk by telephone to allow an equal number of speakers from both sides of the debate. She said this was "not possible".

The week before last, at least 18 different organisations contacted the Committee Chairman, Johnny Brady TD, requesting him to reschedule the discussion to a date in September so as to allow equal representation from both sides, including experts on the health, agronomic, biodiversity, environmental, economic, legal, and food security implications to be nominated by our constituents.

Mr. Brady failed to reply to any of these requests. Instead, the Committee Clerk, Ms Josie Briody, informed us by telephone that the Committee had not only decided to ignore these communications, but that — contrary to our explicit request and to the Committee's earlier plans — the original format for a single discussion with all invited stakeholders on 2 July would be split into three separate meetings.

As a result, the Committee Chairman has made it impossible for the members of the Committee to clarify, discuss and question opposing and contradictory statements in the presence of the stakeholders who make them, in order to avoid the frequent misrepresentations and misunderstandings which unfortunately characterise the nature of Irish public discussion on this important subject.

On 25 June the following email was sent to the Committee Chairman:

From: GM-free Ireland Network <mail@gmfreeireland.org>
Date: Wed, 25 Jun 2008 11:55:45 +0100
To: Johnny Brady <johnny.brady@oireachtas.ie>
Cc: Brendan Smith <brendan.smith@agriculture.gov.ie>, Trevor Sargent <trevor.sargent@agriculture.gov.ie>, Josie Briody <josie.briody@oireachtas.ie>
Subject: URGENT: proposed Ag. Committee meeting on 2 July

Dear Mr. Brady,

I am very disappointed by your failure to respond to the issues raised by me and numerous other members of the GM-free Ireland Network in previous emails concerning the proposed meeting of the Joint Oireachtas Committee on Agriculture scheduled for 2 July.

Ms. Briody informed me by phone yesterday that — contrary to our expressed requests — you are now planning to go ahead with the 2 July date, and also intend to divide the discussion into three separate meetings on the same day.

We repeat our request for you to postpone the discussion until September to enable fair and balanced representation from both sides on GM food and farming issues.

We urge you to arrange the format of the discussion in a single sitting, so as to provide the Committee with an opportunity to clarify, discuss and question opposing and contradictory statements in the presence of the stakeholders who make them, in order to avoid any misrepresentations or misunderstanding in such a polarized and technical discussion.

We want to bring a number of experts nominated by GM-free Ireland to enable the Committee to take into consideration the health, agronomic, environmental, biodiversity, economic, legal and food security implications as part of its scrutiny of the Government's policies on the future of Irish food and farming

Please let me know by return if you agree. If not, I will participate in your meeting on 2 July, albeit with profound misgivings about the way this is being handled.

Yours sincerely

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Mr. Brady failed again to reply. The Committee Clerk responded by phone that "the Chairman does not reply to individuals"!

Open letter to the Minister for Agriculture

Brendan Smith T.D.
Minister for Agriculture, Food and Fisheries
Dáil Eireann
Kildare Street, Dublin 2

Friday 27 June 2008

Re. Hearing of evidence on GMOs by the Joint Oireachtas Committee on Agriculture, Fisheries and Food

Dear Minister,

We are alarmed that the Joint Oireachtas Committee on Agriculture, Fisheries and Food is preventing a fair and balanced discussion on GM food and farming, at its next meeting on 2 July.

The Committee has invited 7 representatives from organisations which sell, use, or promote GM food and farming. These include Monsanto, Syngenta, Teagasc, the European Action on Global Life Sciences lobby group, and 2 pro-GM scientists from UCC [1]. Note that GM crops are grown on less than 2% of the world's farmland.

But the Committee has only invited 1 or 2 representatives from the GM-free Ireland Network, the umbrella group representing 130 diverse organisations which support the agreed Programme for Government to declare the Island of Ireland as a GMO-free crop zone and protect the reputation of Irish beef and dairy exports by encouraging the use of certified non-GMO animal feed. Note also that this group has the largest number and broadest diversity of stakeholders of any NGO in Ireland; its members (together with the populations of the 19 Local Authorities which have declared their areas to be GM-free zones) represent over 1 million citizens; and many of them depend on their ability to produce the safe GM-free conventional and organic food which the vast majority of EU retailers and consumers demand.

This democratic imbalance is a totally unacceptable abuse of Oireachtas procedure, and is also in breach of the Aarhus Convention on public participation in environmental decision making, signed by Ireland and the EU.

The agri-biotech industry is trying to use the rising costs of animal feed and food in a cynical attempt to force the EU member states to approve more patented GM seeds and GM feed and food against the wishes of the vast majority of their farmers, retailers and consumers. The industry now wants the member states to accept three proposals. The first is for the EU to scrap the "zero tolerance" policy for unapproved GM ingredients, by allowing up to 5% of untested GM ingredients to enter our food chain. The second proposal is to approve the introduction of GM agrofuel crops which have substantially contributed to rising feed and food prices; and the third is to approve GM pharma crops that would contaminate our food chain in perpetuity with pharmaceutical drugs and industrial chemicals.

18 different organisations in our Network contacted the Committee Chairman, Johnny Brady TD, requesting him to reschedule the discussion to a date in September so as to allow equal representation from both sides, including experts on the health, agronomic, biodiversity, environmental, economic, legal, and food security implications to be nominated by our constituents. We are dismayed by Mr. Brady's failure to reply, and by a phone call from the Committee Clerk who said the Committee has ignored our requests.

We therefore urge you — in your Ministerial capacity as an *ex officio* member of the Select Committee in accordance with Standing Order 92(1) — to invite the Joint Committee to take the following actions:

- Please re-schedule the discussion on GM food and farming to September, so as to give adequate time for an equal number of stakeholder representatives from both sides to clear their schedules;
- Kindly invite 7 expert speakers to be nominated by the GM free Ireland Network;
- To avoid the typical misrepresentations and misunderstandings that characterise the polarized and technical nature of any discussion on GM issues, enable the Committee to clarify, discuss and question opposing and contradictory statements in the presence of those who make them, by considering the views of all the invited stakeholders in a single sitting (instead of in two or three separate or back-to-back meetings).

We know your remit does not empower you to instruct the Committee, but hope you will communicate our request to its members, bearing in mind the recent U.N. International Assessment of Science and

Technology for Development (IAASTD) report which found that GM crops are not the solution to world hunger, the food security imperative to reduce our dependency on fossil fuel and chemical inputs, and the growing market trend for safe environmentally sustainable agriculture worthy of our reputation as *Ireland – the food island*.

We hope you will give this request your immediate attention, and respond to us as soon as you can.

Yours sincerely

Michael O'Callaghan
Co-ordinator, GM-free Ireland Network

with and on behalf of:

Vincent Cleary, Managing Director, Glenisk Organic Dairy
Josef Finke, Director, Ballybrado Ltd and Good Herdsmen Ltd
Charles Stanley-Smith, Chairman, An Taisce – The National Trust for Ireland
Bruce Darrell, Executive Committee, FEASTA – the Foundation for the Economics of Sustainability
Michael Ewing, Senior Researcher and Aarhus Convention expert, Sligo Institute of Technology
Dr. Elisabeth Cullen, Secretary, Irish Doctors Environmental Association
Lorcan Cribbin, Commissioner-General, Euro-Toques Ireland – The European Community of Cooks
John McKenna, Publisher, The Bridgestone Guides
Paolo Tullio, Food critic, Host, The Restaurant, RTE
Giana Ferguson, Convener, Slow Food Ireland
Darina Allen, Director, Ballymaloe Cookery School
Jill Bell, President, Irish Association of Health Stores
Seán McArdle, Director, Irish Farmers Markets Ltd
Kate Carmody, Chairperson, Irish Organic Farmers and Growers Association
Michael Miklis, Biodynamic Agricultural Association of Ireland
Anita Hayes, Founder, Irish Seedsavers Association
John Brennan, Chairman, Western Organic Network
Cornelius Traas, Chairman Irish Apple Growers Association
Anthony Ardee, Killruddery Farm
Tony Lowes, Director, Friends of the Irish Environment
Anja Murray, Natural Environment Officer, An Taisce – the National Trust for Ireland
Davie Phillip, Education Manager, Cultivate
Dr. Ruth McGrath, Chairperson, VOICE of Irish Concern for the Environment
Karin Dubsky, National Coordinator, Coastwatch Ireland
Sr. Marian O'Sullivan, Director, Dominican Ecology Centre, Wicklow
Julie Newman, Director, Dominican Organic Farm, Wicklow
Ian Wright, Project Coordinator, Irish Natural Forestry Foundation
John Houghton, Director, Forest Friends Ireland – Cairde na Coille
Andy Wilson, Director, Sustainability Institute
Aodhagan Downey, Chair, Sonairte – The National Ecology Centre
Bob Wilson, Director, CELT Centre for Environmental Living and Training
Brendan Price, Director, Irish Seal Sanctuary
Kerry O'Neill, Director, Glendalough Fayre
Fr. Seán McDonagh, Columban Missionaries
Caroline Robinson, Secretary, Cork Free Choice Consumer Group
Ross Lewis, Owner/Chef, Chapter One Restaurant, Dublin

cc. An Taoiseach, Brian Cowen

2. THE AARHUS CONVENTION

The Committee's refusal to allow fair and balanced participation also violates the spirit of the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (see <http://www.unece.org/env/pp/> for details).

The Convention signatories include the European Community, and all its member states including Ireland. It was adopted on 25 June 1998 and entered into force on 31 October 2001.

What is the Aarhus Convention?

The Aarhus Convention is a new kind of environmental agreement. It links environmental rights and human rights. It acknowledges that we owe an obligation to future generations.

It establishes that sustainable development can be achieved only through the involvement of all stakeholders.

It links government accountability and environmental protection. It focuses on interactions between the public and public authorities in a democratic context and it is forging a new process for public participation in the negotiation and implementation of international agreements.

The subject of the Aarhus Convention goes to the heart of the relationship between people and governments. The Convention is not only an environmental agreement, it is also a Convention about government accountability, transparency and responsiveness.

The Aarhus Convention grants the public rights and imposes on Parties and public authorities obligations regarding access to information and public participation and access to justice.

See short online video introduction to the Convention by its Secretary, Jeremy Wates at: <http://www.unece.org/env/pp/vid-presentation.htm>

Ireland's obligations under the Convention

Although Ireland is the only EU member state which has not yet ratified the Convention (and is thus not yet a Party to it — despite having signed it over 10 years ago — the State is obliged to respect the commitments arising from the Convention where they concern provisions falling within the competence of the Community (including EC Directive 2003/4 on Access to Information, Directive 2003/35 on public participation, and others).

The European Commission, acting on behalf of the European Community, made this obligation explicitly clear in a statement issued on 21 November 2007 in response to a request from the Aarhus Convention Compliance Committee during a discussion of case ACCC/2006/17 (European Community) held on 27 September 2007. The Commission statement relates on the one hand to the adjustment by the European Community of Community law to make it compatible with the Aarhus Convention and to the legal certainty which had to be created by the legal acts adopted to as to guarantee full application of the Convention, and on the other hand to the applicability of the Convention to Ireland — the sole EU member state which, having signed the convention over 10 years ago, has yet to ratify it, as a result of its approval by the Community.

The Compliance Committee published the statement on the United Nations Economic Commission for Europe (UN-ECE) website) at www.unece.org/env/pp/compliance/C2006-17/Response/ECresponseAddl2007.11.21e.doc

See exhibit A:

The EC statement concludes (emphasis shown as per the official text):

Applicability of the Aarhus Convention to the Republic of Ireland

The Community and 26 of the 27 current Member States are parties to the Aarhus Convention, Ireland being the only Member State which has yet to ratify it. The need for ratification or parallel approval by the Community and the Member States is explained, inter alia, by the fact that the Community on its own is not in a position to guarantee full compliance with all the Convention's provisions, such as Article 8.

As already explained, the Aarhus Convention became an integral part of Community law through the Council Decision of 17 February 2005 (2005/370/EC).

As a result, although it is not a party to the Convention, **Ireland** will be obliged to respect the commitments arising from the Convention **where they concern provisions falling within the competence of the Community**. Thus, the fact that Ireland has not yet ratified the Convention does not affect the commitments undertaken **by the Community**, the scope of which has been explained above. **Nevertheless, this obligation has an impact solely on Community legal order. In other words, there is no public international convention law impact on Ireland.** No Member State party to the Aarhus Convention can claim under public international law that Ireland has not complied with such and such provision of the Convention, since Ireland has not assumed any public international commitment liable to be applied in accordance with public international law.

"The significance of the Aarhus Convention is global. It is by far the most impressive elaboration of principle 10 of the Rio Declaration, which stresses the need for citizen's participation in environmental issues and for access to information on the environment held by public authorities. As such it is the most ambitious venture in the area of environmental democracy so far undertaken under the auspices of the United Nations." — Kofi Annan, former Secretary-General of the United Nations

3. THE VIENNA CONVENTION ON THE LAW ON TREATIES

The Committee's refusal to allow fair and balanced participation is also in breach of the Vienna Convention on the Law on Treaties (VCLT).

For the official text see: http://untreaty.un.org/ilc/texts/instruments/english/conventions/1_1_1969.pdf

As a member of the European Community, which is a party to the VCLT, Ireland has an obligation to abide by the latter's provisions relating to Treaties such as the Aarhus Convention.

This is made explicit in Article 18 of the Vienna Convention:

Article 18

Obligation not to defeat the object and purpose of a treaty prior to its entry into force

A State is obliged to refrain from acts which would defeat the object and purpose of a treaty when:

- (a) it has signed the treaty or has exchanged instruments constituting the treaty subject to ratification, acceptance or approval, until it shall have made its intention clear not to become a party to the treaty; or
- (b) it has expressed its consent to be bound by the treaty, pending the entry into force of the treaty and provided that such entry into force is not unduly delayed.

The Vienna Convention on the Law on Treaties was signed on 23 May 1969 and came into force on 23 January 1980.

For more information about the Vienna Convention see:

http://en.wikipedia.org/wiki/Vienna_Convention_on_the_Law_of_Treaties

4. WISHES OF THE IRISH PEOPLE IN PUBLIC OPINION POLLS AND SURVEYS

Irish Institute for Bioethics survey of 28 November 2005

A survey published on 28 November 2005 by the Irish Institute of Bioethics in its report "Genetically Modified Crops and Food: Threat or Opportunity for Ireland?" revealed that the vast majority of respondents do not trust the government's safety claims on GMOs and oppose their release in Ireland.

The survey found that:

- 98% of respondents want all foods containing GM ingredients to be clearly labeled (most Irish meat and dairy produce, which comes from animals fed a GM diet, is not labeled as such);
- 85% believe genetic modification interferes with nature more unacceptably than traditional breeding;
- 84% are not confident that the development of GM food and crops is carefully regulated;
- 82% think GM crops pose a threat to the environment;
- 81% believe GM crops can not safely "co-exist" with conventional and organic crops;
- 78% do not trust scientists and government organisations to provide factual information;
- 77% are opposed to the introduction of GM crops in Ireland, even if carefully regulated and monitored;
- 71% refuse to eat food containing GM ingredients under any circumstances;
- 71% do not believe or are not sure that GM foods may contain less pesticides than conventional foods;
- 70% think GM food will adversely affect future generations;
- 68% trust environmental and non-government organisations to provide factual information;
- 60% do not believe GM crops can improve the food supply in developing countries;
- 10% believe that GM foods currently on sale are safe.

Apart from this survey which clearly shows massive Irish opposition to GM food and farming, the Institute of Bioethics report reads like it was produced by Monsanto's PR department.

It concludes that GMO crops "hold a great deal of promise" and are not "morally objectionable".

It is amusing that the Council's own public consultation on GMOs reveals that the vast majority of respondents do not trust the government's safety claims on GMOs and oppose their release in Ireland!

The report can be downloaded from

http://www.gmfreeireland.org/downloads/GM_Report1.pdf (800k PDF file).

Teagasc survey of 13 February 2006

A Teagasc-sponsored survey found that 60% of Irish consumers said they would not want to eat GM food products even if there were discernible health benefits:

Most Irish consumers would turn down GM foods

Irish Independent, 13 February 2006. By Aideen Sheehan, Food Correspondent.

THE majority of Irish consumers would reject genetically modified foods even if they offered specific health benefits.

A new survey shows strong hostility to GM foods, even though a sizable minority would buy GM products under certain conditions.

Around 40pc of consumers might accept certain GM foods if they offered health benefits such as protection against cancer or lowering of cholesterol, but half this group had reservations that would have to be addressed first.

Teagasc asked 300 consumers for their reaction to two hypothetical new GM foods - a yogurt and a dairy spread - to gauge public attitudes to the types of GM foods that might come on stream in the near future.

The anti-GM group tended to be better educated, more health-conscious and keener on natural ingredients, while Dubliners were more likely to accept GM food than Munster people.

Teagasc said the survey showed that GM foods were not widely accepted by Irish consumers, although a detailed analysis showed that clearly labelled GM dairy products with proven health benefits could get a share of the Irish food market.

Irish Times / Ireland.com news poll of 6 May 2006

72% of respondents voted NO in answer to the question "Are you in favour of the GM crop trials in Ireland?"

4. CONCERNS OF IRISH TDs, SENATORS AND MEPs

Statements made at GM-Free Ireland press conference on the proposed BASF GMO potato experiment 22 February 2006

"This is a burning issue - it's perfectly clear from the number, the range and the diversity of people represented here today. The first thing I want to say is: this [i.e. BASF] is a German company. There is plenty of room in Germany. Why do they need to come to Ireland? Can't they do their bloody experiments there?..."

The patenting of life forms is an obscenity. There was a farmer in Canada [i.e. Percy Schmeiser] going along in his normal farming occupations. They established one of these experiments next to him. It contaminated his crop. He was fined a hundred thousand. His entire crop was swiped. That is not fair. We don't want that happening in Ireland!

Then there is the question of blight-resistant potatoes. David McConnell, my former colleague and I hope still a friend, although I disagree with him, acknowledged that blight-resistant potatoes can be produced, albeit sometimes in a slightly slower way, by traditional methods of breeding. Let's not go in the fast lane: we know from our road accident rate in this country that the fast lane can be bloody dangerous.

I have one final thing to say, and it's a serious point. I am going to be calling on the government and I know that Marian [Harkin] and Trevor [Sargent] and other people will also, I think, be disturbed by this? I learnt in just the last week that at the World Trade Organisation's recent meeting in Hong Kong, among the Irish delegation which was used as a Trojan horse by Monsanto, there was a representative of Monsanto. I think that's disgraceful! Monsanto does not represent the Irish people! And I call upon Bertie Ahern and the Government to explain what that Monsanto representative was doing at the WTO trade discussions purporting to represent the Irish people. They do not represent Ireland! And this particular person wasn't even resident in Ireland... They were [at the WTO talks] at Cancún as well! How much to the Irish people know about being represented by Monsanto with the connivance of the Irish government? I call upon Bertie Ahern and the Irish Government to explain how Monsanto is part of our delegation to the World Trade Organisation!"

– **Senator David Norris (Independent)**

"Ireland's record in Europe is a disgrace on GMOs. We have either abstained or we have voted for... At least the Austrian presidency [of the EU] is going in the direction of anti-GMO. They are organizing a conference later this year. And certainly, I hope that that will raise people's awareness. But the problem is: is it going to be too late for Ireland? Because what are we talking about here? Potatoes that we don't need, that we don't want, and that we risk our future status of remaining GMO-free.

There are varieties out there that are blight-resistant. We don't need this, we don't want this. BASF wants this. This country doesn't need it and doesn't want it....

And to me as well, what we're looking at here is the ugly face of globalisation. Patenting life forms should, in itself, be resisted...

We have members of the Seanad, we have members of the Dáil here, and we have no influence on what happens here. I may have some influence on our vote in the European Parliament, but we have no influence on any of this. So there is a democratic deficit because most Irish people do not want GMO foods. And I will just finish by saying: it's not just this generation. We have a duty to the next generation to make sure that we don't do anything that will impact negatively on their future. And I believe if this decision is taken to grant the license by the EPA, that's exactly what we'll be doing."

– **Marian Harkin MEP (Independent)**

"We are committed to making Ireland a GM crop free zone. We must will not allow Ireland's clean and green image to be sold to the highest bidding multinational GM lobbyist..."

I've spoken to many farmers, many farmers in Co. Meath indeed, and in my own constituency of North Co. Dublin, and they are deeply angry about this particular prospect of GM potatoes being grown as a trial in Co. Meath. They see this as nothing more than BASF coming to Ireland, effectively prostituting Ireland by using the name of Ireland to do their trial and then sell their global product with no benefit for Ireland, no benefit for Irish farmers, no benefit for Irish consumers.

And that has to be, for many people, the point of protest which has to finish with success. Because this is a slippery slope, which if we allow it to happen now will create the precedent for the future. And that means that we have to challenge the Government. The Minister for Agriculture in the Dáil told me that there were adequate safeguards, that it was watertight; that nothing could happen that would do any harm to anybody. And I have to challenge the Minister, and we all should challenge the Minister and the Government to say they do not have watertight regulations.

That report on "co-existence" is a draft. It has been found to use the same terms which failed in Spain and other countries where GM has been grown. It is not watertight either in terms of potatoes. You will not know if your potato crop has been contaminated until the second year after harvest when you go to grow seed again and discover the fatal result then.

So there's no way that this Government can give any guarantees about this trial. And BASF knows that well. The only buffer zone that will be of any use in this country is the Irish Sea, and that should be the one we insist on!

– **Trevor Sargent TD (Green Party)**

Statements made at the GM-free Ireland press conference on European Day 10 May 2006

At a GM-free Ireland press conference held on European Day, 10 May 2006 at the European Commission Office in Dublin, Marian Harkin MEP, Martin Ferris TD, Michael Mulcahy TD, Trevor Sargent TD, Kathy Sinnott MEP, and Mary Upton TD called for the whole island of Ireland to become a GMO-free zone for the food security of the other EU member states, and said the EC must recognise the democratic legal right of member states and regions to ban all GMO seeds, crops, trees and livestock if they wish to do so.

The press conference was held immediately prior to a speech by EC Agriculture and Rural Development Commissioner Mariann Fischer-Boel in the Dáil - the first such visit by an EC Commissioner to the Irish Parliament.

Kathy Sinnott MEP, the independent European Parliament delegate to the World Trade Organisation, said the EC's refusal to recognise Ireland's right to conserve its GM-free status would topple the EU Constitution. The EC cannot achieve the EU Constitution without it being approved by referendum in Ireland. She said "Remaining GMO-free is vital for the health of the Irish people and for all those who consume Irish farm and food produce around the world, and for the economic viability of the Irish farm and food sectors. The EU's attempt to force GMO seeds and crops on us will make it impossible to convincingly market Irish food as safe and healthy under Bord Bia's brand of Ireland - the Food Island.

Her warning came as a final WTO ruling on the US-EU GMO trade war claimed that EC-approved bans on GMO crops broke trade rules. Greenpeace International said the WTO verdict proves it is unqualified to deal with complex scientific and environmental issues, as it puts trade interests above all others.

Marian Harkin MEP (Independent) also called for Ireland to be declared a GMO-free zone and for the EC to recognise our legal right to do so.

Michael Mulcahy TD (Fianna Fáil - Government Convener on the Joint Oireachtas Committee on European Affairs and former Lord Mayor of Dublin) said "there is absolutely no advantage for the Irish agriculture industry to plant GM crops. Ireland has long has a reputation as a producer of top quality natural fresh food produce. If we go down the GM path, we will reduce our international reputation and become simply another mass food producer. This could have disastrous consequences for Irish agriculture. I am calling on the Minister for Agriculture and Food, Mary Coughlan TD, to take a decisive lead in this area. Additionally, there are environmental and food safety issues, and I note that the European Union Environment Commissioner Mr. Stavros Dimas has criticized the European Food Safety Authority for failing to consider the long-term health and environmental risks of GMOs. GM food is bad for Irish agriculture, bad for our environment, and bad for our consumers."

Mary Upton TD (Labour Party spokesperson on Agriculture and Food) said the Labour party fully supports the campaign to keep the whole island of Ireland GM free and joined the call for the EC to recognise the democratic right of its member states and regions to remain GM-free if they so choose.

Trevor Sargent TD, leader of the Green Party, accused the EC of colluding with the WTO to indulge the commercial colonisation tactics of GM biotech companies. "The fight to ensure the people can keep the country free of GMO seed and crops now takes on a renewed impetus following the recent decision by

the Environmental Protection Agency to grant permission for GM trials in Co. Meath. An historic blow for democracy was struck last Monday by Meath County Council when a Green Party motion that the county should be made a GM free zone was unanimously endorsed. Meath now joins over 3,500 local authorities and 172 regions, provinces and prefectures which are declared GMO free areas. He told Fisher Boel "The people and farmers of Ireland are not asking, they are telling the European Commission that they will determine the future of our GM free status which up to now has been taken for granted. The words of Herr Rudi Anschober, Minister for the Environment in Austria are a call to action in Ireland too when he says that 'it is a basic principle that we can decide on our own what will grow in our fields! We demand the right of self-determination for the region'."

Martin Ferris TD (Sinn Féin Spokesperson on Agriculture and Food) condemned the Government's ongoing attempt to introduce GMO crops and food products into Ireland. "There has been no debate on the issue either in Leinster House or among the general public. No elected body has voted in favour of GM and yet Government officials have consistently adopted a pro-GM stance in Brussels. The implications of GM for Irish agriculture are enormous. If GM crops are allowed to be grown here, non-GM crops will inevitably be contaminated with all the potential damage which that would have on the safety of Irish food produce, and the image of this island as the source of clean safe food."

6. MEDIA BIAS ON GM ISSUES

The pre-requisite for real democracy is an informed electorate. In relation to GM issues, those with the greatest need to be informed include Government policy makers, the regulatory bodies, civil servants, farmers, food producers, food processors, and consumers.

Unfortunately, the Irish media provide little coverage of GM issues compared to the media in other EU member states. To make matters worse, most of this coverage - with rare exceptions - is demonstrably biased in favour of the agri-biotechnology industry. To add insult to injury, most of this biased coverage is linked to blatant conflicts of interest.

Disinformation about GM food and farming - perpetrated through biased, misleading, irresponsible reporting - are not acceptable in Ireland's "knowledge-based economy".

RTE

RTE is a Public Service Broadcaster owned by the Irish People, and run by a Government-appointed Board. This is chaired by Mary Finan, head of Ogilvy Ireland Group subsidiary Wilson Hartnell Public Relations, whose clients includes pharmaceutical companies and the Government's pro-GM Food Safety Promotion Board. RTE board member Stephen O'Byrnes (the former Director of Policy and Press Relations for the PDs and Assistant Government Press Secretary in the 1989-1992 Fianna Fáil-PD Government) is now Executive Director of MRPA Kinman Communications, whose clients include agribusiness companies.

RTE only aired four TV programmes on GM food and farming in recent years. A Prime Time debate in March 2005 was interrupted by the Pope's extreme unction. There was a heated argument on David McWilliams' Big Bite show in November 2005, but RTE censored the video version. A brief debate on Seoige & O'Shea in March 2007 gave more time to Monsanto than to the public side. RTE news coverage of the issue is rare and superficial. Questions and Answers, the Late Late show and Tubridy Tonight avoid the subject altogether. Fleeting coverage on Eco-Eye, Ear to the Ground and Nationwide has a noticeable pro-GM spin.

A rare exception occurred in January 2007, when RTE broadcast *The Future of Food*, an independent documentary overview of GM food and farming problems, featuring interviews with scientists, contaminated farmers, lawyers and consumer groups. The film includes an account of Canadian farmer Percy Schmeiser, who lost ownership of his seeds and crops after Monsanto sued him for patent infringement in 1998. Dozens of viewers contacted RTE requesting more coverage of the GM issue.

But Monsanto Ireland manager Patrick O'Reilly fired off furious emails to our government agencies claiming the film is biased, and filed a formal complaint with the Broadcasting Complaints Commission (BCC), alleging that its coverage of GMO patent issues breached the Broadcast Code requirement for impartiality. The BCC's response was never made public, but it seems that Monsanto abandoned the complaint — influenced, perhaps, by a lawsuit filed against the US Patent and Trademark Office, which rejected one of Monsanto's key GMO patents on the grounds that Monsanto abused the patent to "try to bankrupt farmers or put them out of business."

The Irish Times

In a thesis entitled **Debating GM: An analysis of GM coverage in the Irish Times and the Irish Farmers Journal from March 2004 to February 2006**, Dublin Institute of Technology journalism student Emma Somers made a quantitative analysis of the sources, and a qualitative analysis of GM coverage in these two papers. The study revealed significant bias towards the biotech industry.

Of the 48 articles published in the Irish Times, 84% quoted official sources (including the EC, Irish politicians, the Dept. of Agriculture, the Food Safety Authority of Ireland, biotech corporations and biotech industry lobby groups); 21% quoted Non Governmental Organisations; only 10% quoted farmers. Most articles framed the issue as scientists versus Luddites.

The Irish Times' pro-GM bias and reliance on industry sources reflects the paper's special relationship with the biotech industry via Prof. David McConnell, who is well-known for his repeated public attempts to deny the existence of any scientific evidence of the health or environmental risks of GM food and farming. Prof. McConnell is both the Chairman of the Irish Times Trust (which owns the paper through a private company which it controls) and a non-executive Director of the Irish Times Ltd. Prof. McConnell is also the Co-chair (along with a former Vice President of the World Bank) of a biotech lobby group called European Action on Global Life Sciences (EAGLES). According to its website at www.efbweb.org, EAGLES is "a task force of the European Federation of Biotechnology" whose members include Monsanto Europe, the Association of German Biotech Companies, the Biotechnology Industry Organisation (USA), etc.

Prof. McConnell is also the head of TCD's Smurfit School of Genetics (which may be partially funded by the industry).

The Irish Times Trust therefore appears to promote the commercial interests of agribusiness biotech corporations which fund its Chairman's university and lobby group.

The conflict of interest arising out of Prof. McConnell's dual roles as Chairman of the Irish Times Trust and Coordinator of the EAGLES biotech lobby group clearly violates the core object of the Trust's Memoranda and Articles of Association, "to publish an independent newspaper primarily concerned with serious issues for the benefit of the community throughout the whole of Ireland, free from any form of personal or of party political, commercial, religious or other sectional control."

This conflict of interest violates the core object of the Trust's Memoranda and Articles of Association, "to publish an independent newspaper primarily concerned with serious issues for the benefit of the community throughout the whole of Ireland, free from any form of personal or of party political, commercial, religious or other sectional control."

In view of the fact that the Irish Times Trust is a registered charity, the Revenue Commission should revoke the Trust's charitable status.

For more detailed information, see *Irish Times slammed for media bias on GM issues: Irresponsible journalism stifles informed debate - Conflict of interest with biotech lobby group*, GM-free Ireland press release, 25 October 2007. Download: www.gmfreeireland.org/press/GMFI37.pdf

The Irish Farmers Journal

The Dublin Institute of Technology study also analysed 30 articles on GM issues in the Irish Farmers Journal, which is widely regarded as the voice of the Irish Farmers Association. 70% of the articles quoted the "power elite"; 47% quoted EC or government officials; 44% quoted the biotech industry and its lobby groups; 10% quoted farmers; none quoted Non Governmental Organisations (which have the most concern and independent scientific expertise on GM food and farm problems).

RTE's broadcast of *The Future of Food* documentary about GM food and farming on 28 January 2007 was a perfect opportunity for the Journal to discuss the pros and cons of GM farming. Instead of reviewing the documentary's substantive content, the Journal just quoted Monsanto's dismissal of the film as a "polemic" made "in the style of a 'Dr. Who' take on GM food debate, full of scary claims about three headed potatoes and celeries that can dance a salsa."

But some IFA members who saw the film called for it to be screened at the IFA National Council.

For years, the IFA management told its members it had "no policy" on GMOs. But the IFA is a member of the main EU farm group COPA-COGECA, which regularly lobbies the EU Parliament, the Council of Ministers, the European Economic and Social Committee and the Committee of the Regions to legalise GM crops and to prevent EU member states from banning them. The IFA has never voted against these policies. The president of COGECA (and former head of COPA) is ex-IFA President Donal Cashman.

In 2006, the IFA came out of the closet and summarised its policy as follows in the *Irish Farmers Journal*: (a) "Irish farmers must embrace GM farming to remain competitive" (nonsense because there is no market for GM food in Europe); (b) "Our Government can't decide on GM policies as these are made by the EC and WTO" (Ireland is a signatory to the Cartagena Protocol on Biosafety which recognises our right to ban GMOs through the Precautionary Principle, and also signed the Aarhus Convention which empowers citizens to participate in environmental policy making; Ireland also votes on GMO issues at the Council of Ministers); and (c) "The IFA is opposed to patenting of crops" (since most GM crops are patented, this must be a sop to irate IFA members who know about the patent issue and the cover-up). Whether IFA receives biotech funding is unclear, but the Irish Farmers Journal routinely takes advertising revenue from Monsanto and other agri-biotech-pharmaceutical corporations.

Prominent IFA member Jim McCarthy, who farms a 42,000 acre GMO soya ranch in Argentina and 2,000 acres in Kildare, says GM farming is "all about profit, the rest is commentary". This may be true for giant South American agribusiness ranchers who have no scruples exploiting displaced indigenous slave labour to turn tropical rainforest into the GM fodder which is being fed to most Irish cattle and sheep, with no label to inform the consumer. But Irish farmers who avoid GM animal feed for ethical, food safety and/or commercial reasons are securing million Euro foreign direct investments, price premia and access to prime EU beef and dairy markets from which farmers who still use GM animal feed are being excluded. The IFA's pro GM position isolates it from the Irish Cattle and Sheepfarmers Association, the National Beef Association

(N.I), the Irish Organic Farmers Association and the Organic Trust — all of which oppose the release of GM crops in Ireland as there no market for GM food in Europe.

The Irish Farmers Journal is owned by the Agricultural Trust, a registered charity set up to be “the best source of Irish farming and rural news”. The Revenue Commission should revoke the Trust’s charitable status for its active misinformation on GMOs.

The Irish Independent

Unlike its UK counterpart, the Irish Independent (and Farming Supplement) provides thin coverage, characterising opponents of GM food and farming as Luddite crackpots who want to deprive starving African babies of their fair share of GM food.

One of the Indo’s Directors, former Attorney-General Dermot Gleeson, is also Chairman of the Irish Council on Bioethics (ICB).

In March 2005, ICB published a report called “*Genetically Modified Crops and Food: Threat of Opportunity for Ireland?*” Launched at the Royal Irish Academy with Monsanto Ireland in attendance, the 74-page report’s carefully nuanced text gives the impression of due diligence but concludes that “the Council does not view the genetic modification of crops as morally objectionable... GM crop and food technology holds a great deal of promise”, and calls for “public research programmes in GM crop development that are mainly targeted at developing countries.”

When the Danish Environment Minister proposed the same idea to the EU Council of Ministers, Environment Commissioner Stavros Dimas said “if GM crops are not acceptable for us in Europe, we can’t promote them for developing countries!”

Ironically, an ICB survey found that 78% of Irish people no longer trust scientists and government to provide factual information on GM issues, and that 77% of us oppose the introduction of GM crops, even if “carefully regulated and monitored”.

B. SUBSTANTIVE ISSUES

1. GM AGROFUEL CROPS

Agrofuels and Ireland: a Trojan horse for GMOs

GM agrofuel seeds and crops present the most likely route for the importation and/or environmental release of approved and unapproved Living Genetically Modified Organisms (GMLOs) on the island of Ireland.

GM oilseed rape

Some GM seeds, including oilseed rape (known in the USA and Canada as “Canola”), are widely used for the production of agrofuels as well as animal feed. This is intended for use as animal feed, and was normally imported in crushed form only, because of the lack of oilseed rape crushing facilities on this island. Crushed GMO seeds, being unviable, present no danger of sprouting and proliferation.

But numerous oilseed rape crushing facilities have recently been put in place for the production of agrofuel, backed by government subsidies.

According to the Department of Agriculture, 95% of oilseed rape imported to Ireland for animal feed over the past number of years consists of GM varieties. It is therefore possible, if not extremely likely, that viable oilseed rape seeds which have been and continue to be imported for processing into agrofuel in recent years are also GM — particularly if they are grown by the same farmers, exported by the same countries, shipped by the same companies, carried in the same holds aboard the same vessels, imported through the same ports, unloaded via the same dockside equipment, stored in the same sheds and silos, transported to their ultimate destinations around the country on the same lorries as the crushed GM seeds that have heretofore been imported only for intended use in animal feed.

Cultivation vs. processing

EU Directive 2001/18/EC (of the European Parliament and of the Council of 12 March 2001 on the deliberate release into the environment of genetically modified organisms and repealing Council Directive 90/220/EEC), stipulates the following:

- Importation and placing on the market of GM products intended only for use as feed, food or processing require approval by the Competent Authorities — in this case the Department of Agriculture and the Department of Health.
- Importation or deliberate release of live GMOs for the purpose of *cultivation* requires prior approval by the Competent Authority — in this case the Department of the Environment.

The problem is that —even if this Deliberate Release Directive were strictly enforced in Ireland — it does not prevent the importation of live GMO seeds intended for *conversion via processing* into agrofuel.

This loophole is a glaring breach in our defences against accidental or adventitious or accidental contamination by GMLOs.

Recommended action:

It is therefore is a matter of immediate urgency for the Government and the Northern Irish Assembly to implement the Precautionary Principle by taking whatever practical steps are necessary to prevent the damage before it starts to occur. The urgency arises from the fact that any environmental release of GMLOs such as even a handful of oilseed rape seeds would probably be impossible to contain if not discovered before the seeds had produced a harvest of pollen-producing plants which could rapidly cross-contaminate the entire country in perpetuity.

- Establish immediate legislation to prevent the importation and/or placing on the market of any live GM seeds which fall under the category of Genetically Modified Living Organisms (GMLOs), as opposed to non-living GM materials which have been rendered non-viable due to prior crushing or other forms of processing prior to their importation.
- Require all importers of live GMO seeds intended for conversion to agrofuels to obtain a non-GMO certificate from an accredited testing laboratory as a prior condition of importation.

- Test every incoming shipment of seeds for GMO content before these are allowed to be unloaded.
- Implement the Polluter Pays principle with strict liability (punitive fines) as well as redress (damages against the offended party), as a means to enforce compliance.

The Cartagena Protocol on Biosafety

The Irish Government and the Northern Ireland Assembly have the legal right to establish a blanket ban on the importation of live GMO seeds under the Cartagena Protocol on Biosafety – to which the EU is a Party and which entered into force on 11 September 2003. This Protocol to the Convention on Biodiversity recognises the right of any country to say “no” to GMOs on the basis of the Precautionary Principle.

This Protocol is one of the most important international treaties recently adopted. It marks the commitment of the international community to ensure the safe handling, transfer, handling and use of living modified organisms. It is an historic commitment as it is the first binding international agreement dealing with biosafety, thereby addressing novel and controversial issues. To conclude the negotiation of a treaty marks an end, but also a beginning: the beginning of an implementation process which will determine whether the results of the negotiation will, in reality, achieve the objective which originally set the negotiation process in motion. One prerequisite for the successful implementation of a treaty is an understanding of the text itself, and of its implications. In this regard, since the text of the Cartagena Protocol may well not be readily accessible to all the Irish stakeholders who will need to become involved with its implementation, we recommend concerned parties to obtain a copy of the excellent Explanatory Guide published by IUCN - World Conservation Union.

GM-free Ireland asked Rémi Parmentier (chairman of the Varda Group www.vardagroup.org and former Political Director of Greenpeace International) to summarise the implications of this Protocol for Ireland. Here is his considered response:

“Art 10.6 of the Protocol, which is EU law, recognises that when governments make decisions regarding the import of living modified organisms,

‘Lack of scientific certainty due to insufficient relevant scientific information and knowledge regarding the extent of the potential adverse effects of a living modified organism on the conservation and sustainable use of biological diversity in the Party of import, taking also into account risks to human health, shall not prevent that Party from taking a decision, as appropriate, with regard to the import of the living modified organism in question, in order to avoid or minimize such potential adverse effects’.

Furthermore Article 11 defining the procedure for living modified organisms intended for direct use as food or feed, or for processing, also states the following (Paragraph 8):

‘Lack of scientific certainty due to insufficient relevant scientific information and knowledge regarding the extent of the potential adverse effects of a living modified organism on the conservation and sustainable use of biological diversity in the Party of import, taking into account risks to human health, shall not prevent that Party from taking a decision, as appropriate, with regard to the import of that living modified organism intended for direct use as food or feed, or for processing, in order to avoid or minimize such potential adverse effects’.

These two articles are the recognition, by the international treaty that regulates the international trade in living modified organisms, of the precautionary principle whereby governments should take preventative action before environmental damage starts to occur, when there is a reasonable cause for concern. Since the Biosafety Protocol was drafted and negotiated in the years 1999 and 2000, scientific backing to the precautionary principle has increased in the light of additional evidence on the risks of genetically modified organisms to biodiversity (e.g. the Mexican maize contamination case, among others). A ban or embargo on GMOs in Ireland or elsewhere would therefore be fully legitimate, is backed by science, and would be in line with the provisions of the Biosafety Protocol.”

The Fourth Meeting of the Conference of the Parties serving as Meeting of the Parties to the Cartagena Protocol on Biosafety took place in Bonn, Germany in May 2008. For details see <http://www.cbd.int/mop4/> and <http://www.iisd.ca/biodiv/bs-copmop4/>

For more information see: *An Explanatory Guide to the Cartagena Protocol on Biosafety*. IUCN Environmental Policy and Law Paper No. 46. Published by IUCN - The World Conservation Union, Gland, Switzerland, 2003. ISBN: 2-8317-0671-8.

Can be ordered online from: www.iucn.org/bookstore • Tel: + 41 22 999 0001.

Agrofuels and the rise in oil prices and food costs

See: <http://www.foeeurope.org/agrofuels/index.html>

The high price of oil is a key contributor to the food crisis. Not only because our food system is intensely dependent on fossil fuels for fertilisers, farm machinery and transport, but also because any increase in the oil price is an additional incentive to use crops for energy rather than for food.

In 2007, the US diverted 54 million tonnes of maize to produce bioethanol and the European Union used 2.85 million hectares of land to grow rapeseed oil and other crops for agrofuels. If the same land had been used to grow maize and wheat for food, it would have yielded an estimated 68 million tonnes of grain, enough to supply food for 373 million people every year. This equals the combined populations of the 28 least developed countries in Africa.

The rush for agrofuels in international markets is diverting productive land away from growing food to growing fuel and driving up grain prices, in addition to driving rainforest destruction, which fuels climate change. As an immediate measure, mandatory agrofuel targets in developed countries must be suspended and legislation implemented to ensure agrofuel production does not threaten food security, particularly in developing countries.

See **Agrofuels: Towards a Reality Check in Nine Key Areas**. Report prepared in collaboration of eleven organisations for the SBSTTA 12 meeting of the Convention on Biological Diversity (CBD), Paris July 2007. This paper sets out critical concerns regarding direct and indirect impacts of agrofuel (production) in light of the current push to develop agrofuels in transport, especially in industrialised countries.

View summary: http://www.econexus.info/pdf/Agrofuels_ExecSum.html

Download report: <http://www.econexus.info/pdf/Agrofuels.pdf> (366 KB pdf file)

Call for an immediate moratorium on EU incentives for agrofuels, EU imports of agrofuels and EU agroenergy monocultures

A broad range of international stakeholders are now calling for an immediate moratorium on EU incentives for agrofuels and agroenergy from large-scale monocultures including tree plantations and a moratorium on EU imports of such agrofuels. This includes the immediate suspension of all targets, incentives such as tax breaks and subsidies which benefit agrofuels from large-scale monocultures, including financing through carbon trading mechanisms, international development aid or loans from international finance organisations such as the World Bank. This call also responds to the growing number of calls from the global south against agrofuel monocultures, which EU targets are helping to promote.

For details see: <http://www.econexus.info/biofuels.html>

EU biofuels target 'probably a mistake,' France says (EU Observer, 30 June 2008):

... Reuters reports that the working group set up by the European Commission and EU member states to consider how to develop environmental and social criteria on biofuel production and imports is close to agreement on a set of standards.

Quoting the Slovenian diplomat appointed to chair the group's discussions, Miran Kresal, the news agency says the group is likely to include language preventing the use of biofuels grown in habitats of endangered species, or biodiverse savannahs and grasslands, as well as land whose use has resulted in significant net emissions of carbon dioxide.

Legally binding labour standards were ruled out by the group due to concerns that such a move would not pass muster with the World Trade Organisation. Instead, the group will be looking to task the European Commission with the job of strict monitoring of social standards.

The key concern of environmentalists - the amount of CO₂ emitted who in the last year have moved from being supporters of biofuels to campaigning against their use, remains a source of contention within the working group, however.

Biofuels and food prices

The group has not developed any criteria relating to the possible effect of biofuels on food prices.

While the European Commission has repeatedly argued biofuels policies have had a negligible impact on food costs, the UN Food and Agriculture organisation says that biofuels explain 10 percent of recent price rises.

The International Monetary Fund puts this figure at 30, a figure backed by the International Food Policy Research Institute. The World Bank, however, says that biofuels have contributed to 65 percent of the price rises.

Dragan Barbutovski, a spokesperson for the Slovenian presidency of the EU, told EUobserver "The working group was set up long before the food crisis was high on the EU's agenda."

"As such it only ever had a mandate to assess potential sustainability criteria for the fuel quality directive and the renewable energy directive," he added.

2. GM PHARMA CROPS

A number of Irish players including Fine Gael MEP Mairead McGuinness have recently advocated the introduction of GM pharma crops. These are crops genetically modified to produce a variety of products including industrial plastics, and pharmaceutical substances including blood clotters, blood thinners, anti-HIV compounds, contraceptive drugs, and so on.

GM pharma crops are widely regarded as the most dangerous of all GM crops because of the risk they pose through contamination of the food chain: an accident waiting to happen.

With “just one mistake by a biotech company, we’ll be eating other people’s prescription drugs in our cornflakes.”

Larry Bohlen, Friends of the Earth

“...we should be concerned about the presence of a potentially toxic substance in food plants. After all, is this really so different from a conventional pharmaceutical or biopharmaceutical manufacturer packaging its pills in candy wrappers or flour bags or storing its compounds or production batches untended outside the perimeter fence?”

Editors of Nature Biotechnology
(the industry’s leading journal, in an editorial titled “Drugs in crops -- the unpalatable truth”)

“...it is possible that crops transformed to produce pharmaceutical or other industrial compounds might mate with plantations grown for human consumption, with the unanticipated result of novel chemicals in the human food supply.”

“Environmental Effects of Transgenic Plants: The Scope and Adequacy of Regulation,”
Committee on Environmental Impacts Associated with Commercialisation of Transgenic Plants
U.S. National Academy of Sciences,
National Academy Press 2002, p. 68.

“The fact that they’re purposely growing pharmaceutical drugs in food crops seems indefensible and foolhardy in the extreme.”

Craig Culp
Spokesman
Center for Food Safety
Washington, DC

“It’s very hard to contain plant viruses. The tobacco mosaic virus can be very stable, and it can also infect food crops like the tomato. We’ve seen no public risk assessment of any kind about what the potential hazards are.”

Doug Gurian-Sherman
Senior Scientist
Center for Food Safety
Washington, DC

“Even food-processing corporations are very upset about this as well, because they know all you need is one shipment of corn flakes that has a contraceptive in it and there’s a real problem, obviously.”

Paul Achitoff
Managing Attorney
Earthjustice, Hawaii

“It is impossible to know whether these biopharmed crops present any food-safety or environmental risk, since the whole process is shrouded in secrecy. Even the Food and Drug Administration is out of the loop. What is clear is that the biopharming industry has been given a big green light by federal regulators, even though there is great concern among food producers and consumers about using food crops to produce drugs.”

Gregory Jaffe
Director, Center for Science in the Public Interest biotechnology project

“When non-food crops like tobacco can be used for biopharming, it is unnecessarily risky to use crops like corn or rice without a much stronger and more transparent regulatory system. It would be a public relations catastrophe for both the biotechnology industry and the food industry if even minuscule amounts of vaccines or other drugs ended up in cereal.”

Gregory Jaffe
Director, Center for Science in the Public Interest biotechnology project

Consequences of GM crop contamination 'are set to worsen'

www.guardian.co.uk, Monday February 18, 2008

By James Randerson in Boston.

The consequences of contamination between GM crops and non-GM varieties will be much more serious with the next generation of GM crops, an influential group of US scientists has warned.

Mixing between GM and non-GM varieties has already caused serious economic losses for producers in lost sales and exports. But the consequences of mixing will be much more serious with new crops that are altered to produce pharmaceuticals and industrial chemicals, the scientists argue. The crops could harm human health and be toxic to wild animals.

"What would be the impact societally, economically if for example, cornflakes were contaminated by some sort of drug or chemical? I think it would be a vast impact economically," said Karen Perry Stillerman, senior food and environment programme analyst with the Union of Concerned Scientists.

"I think it's really hard to say [what impact contamination would have] because there is a variety of different drugs and chemicals that might be manufactured in plants this way," she added. "Our perception is that some of them might be toxic, but all of them would certainly cause tremendous economic upheaval."

The group presented its findings at the American Association for the Advancement of Science conference in Boston.

Huge research effort

Up to now, commercial GM varieties have been restricted mainly to modifications for herbicide tolerance or resistance to pests. But a huge research effort is going into a new generation of crops that are genetically modified to produce drugs, hormones, vaccines and industrial chemicals such as the precursors of plastics.

Although public opinion in Britain and the rest of Europe remains firmly against GM crops in general, it is more favourable to crops with medical benefits. But the Union of Concerned Scientists said that these are precisely the crops that pose the greatest risks if they exchange genes with wild relatives or conventional versions of the same crop.

So-called "pharma crops" can offer advantages over current methods of drug manufacture. Vaccines produced this way could be grown cheaply in developing countries and simply given to patients in the food. That would remove the need for sterile needles and refrigerators to keep vaccine doses cold - a major obstacle for delivering therapies in poor countries.

Prof Paul Gepts, a plant geneticist at the University of California, Davis, said past experience suggests that "contamination" events cannot be avoided. "Gene flow is really a regular occurrence among plants. So if you put a gene out there it's going to escape. It's going to go to other varieties of the same crop or to its wild relatives," he said. "It's clear that zero contamination is impossible at present."

Major economic losses

There have been a handful of examples in the US and elsewhere of genes from GM varieties not cleared for human consumption getting into nearby food crops and hence the human food chain. This has led to major economic losses for producers in lost sales, exports and clean-up costs, but there have been no proven cases of damage to human health.

"With the products we are talking about, there's the potential for that to be much more serious than what we have seen so far," said Prof Robert Wisner at Iowa State University.

According to Gepts, most of the ideas for keeping crops apart are inadequate, because pollen and seed are carried on the wind, by animals and birds and on farm machinery. He said the only way to be sure that food crops would not be contaminated by drug genes or genes for industrial chemicals would be to use non-food crops such as tobacco.

Alternatively, GM food plants could be grown in greenhouses or underground to prevent pollen escaping, he said.

Call for ban

The Union of Concerned Scientists is calling on the US Department of Agriculture to ban the growth of GM pharma crops outdoors unless they are species that are not eaten by people or livestock.

The USDA is currently putting together new guidelines on GM that are expected to be completed by the end of the year. Currently, no GM crops that produce industrial chemicals or pharma crops are grown commercially, although there are some field trials under way in the US.

Similar issues will apply in the UK and Europe if pharma crops are approved. So far, though, only a handful of GM crop varieties are grown in Europe.

For more information on GM pharma crops see:

www.pharmacrops.com

www.centerforfoodsafety.org

3. ZERO TOLERANCE OF UNAPPROVED GM FOOD AND FEED

**Briefing on EU Animal feed imports and GMO policy
by CPE - European Farmers Coordination, Friends of the Earth Europe, and Greenpeace
May 2008**

Following the European Commission's orientation debate on GMOs which was held on May 7th, Commissioner Vassiliou (DG Health) has been asked to put forward technical proposals on "zero tolerance" and "asynchronous approvals" by the summer.

"Zero tolerance" is the EU's policy whereby any imports (soy and maize essentially) that are found to contain even trace amounts of a GMO that has not been approved for import and processing in the EU cannot enter the European Union.

1. The Global rise in food and feed prices

- The underlying causes of the global price increases in food and feed are:
 - increased demand in soy
 - the shift away from food/feed production to biofuels,
 - global and local financial speculation, in particular over the last year
 - the deregulation of agricultural markets that has led to the depletion of stocks
 - the rise in oil prices
 - increased droughts and floods in major grain producing countries
- Price increases have occurred around the world including in the US, which has the most permissive system of GM approvals.

Weakening EU GMO laws will not address this crisis.

"In OECD countries, at least, this growth of biofuel production has thus far been driven largely by policy measures and the report says that it is not clear that the energy security, environmental and economic objectives of biofuel policies will be achieved with current production technologies. The report suggests further review of existing biofuel policies."

Quote from OECD press release on the May 2008 OECD and UN FAO Agricultural Outlook, 29/05/08 full report at www.agri-outlook.org/

The two crops that have been focussed on by the European Commission's DG agriculture as potentially being problematic have been maize and soy. Point 2 below addresses global soy and maize supply. Point 3 then looks briefly at new GMOs being marketed and what this means for Europe and point 4 compares GMO approval systems in key countries in order to assess whether EU GMO policy is blocking access to animal feed

2. Supply and Demand of soy and maize

MAIZE

Sourcing maize is not a problem, as acknowledged by DG agriculture in its June 2007 report on: *"Maize grain imports that are potentially affected by the presence of EU-non approved GMOs could be replaced by maize from EU-27, by other domestic cereals, or by imports from other trade partners."* The report continues stating that *"Even when considering the combined imports of maize grains, CGF [Corn Gluten Feed] and DDG [Distillers Dried Grain], an interruption is unlikely to have a strong economic impact on future feed imports and livestock production at the overall EU level."*

SOY

Soy is a different issue because the EU is highly dependent on imports as it grows only a small amount of plant proteins domestically:

- As the US starts to grow GM soy that it not authorised in the EU (the most often quoted product is Monsanto's RoundUp Ready Soy 2), importing US soy will become potentially more problematic in the EU. However, the US is no longer a major soy exported to the EU.
- Both the US Department of Agriculture (USDA) and the European Commission's DG Agriculture have reported a drop in US soy exports in the last years mainly due to Latin American production being more competitive. In its soybean trade and market outlook to 2017, the USDA states that "Brazil should soon attain export supremacy as the production costs of its soybean farmers are very competitive relative to U.S. producers. Within 10 years, a strong expansion of foreign exports could reduce the U.S. share of the global market to 21 percent—just half of the 2006/07 market share."
- Concern has been raised that Brazil will rapidly commercialise Monsanto's Round Up Ready 2 which is not (yet) authorised in the EU. However, Monsanto's 2007 Annual Review only mentions that it is aiming for commercialisation of RR2 in Brazil "after the turn of the decade" so the adoption of RR2 in a key exporter country to the EU is therefore at most in the very early stages of an authorisation request. (<http://www.monsanto.com/pdf/pubs/2007/2007AnnualReport.pdf> page 12, 13)"
- According to the European Commission's 2007 Outlook for World Agriculture Commodity Markets, "Oilseeds and vegetable oils are in plentiful supply. Unlike grains, world stocks of soybeans are at record levels and a large South American crop this year, to quote one analyst "the world is swimming in soybeans". The report does sound a warning that this could change if the US were to reduce its soy production, but after an initial drop as farmers moved to the more lucrative biofuel production, the high price of soy has meant that they are now turning back to soy.
- The demand for soy in emerging markets, China in particular, is also raised as a threat to the EU import market but only in relation to what kind of soy (which types of GM, GM or nonGM), not in terms of quantity. According to the USDA (2007): "Brazil's vast reserves of farmland could permit a continued significant expansion in soybean area. Argentina's soybean growing regions and crushers are located close to port facilities, and the relatively small domestic market makes it the world's largest exporter of soybean meal and oil. A lower export tax on processed commodities than on unprocessed commodities also favours the export of soybean oil and meal from Argentina.
- Interestingly, the USDA also predicts a drop in EU soybean imports: "improved EU grain crops are expected to cut back soybean meal consumption in 2008/09. Demand in the following years should erode gradually, prompting only modest growth in EU imports of soybean meal and a moderate reduction for soybean imports."

3. Setting the scene: New GMOs on the market

- The new genetically modified crop that has been most frequently mentioned in relation to availability and price of animal feed for the European livestock industry is Monsanto's new RoundUp Ready Soybean 2 (RR2)
- According to the company's website, "Monsanto will continue to move aggressively" toward the commercialisation of RR2 although it will nevertheless, according the Europabio (reported in the Journal Nature Biotechnology) hold off this year as the EU has not authorised RR2 yet. It is however saying that it will push ahead in the US from 2010 onwards and Europabio has threatened that as seed multiplication activities will commence this year, there could already be contamination in the immediate term (quoted in Nature Biotechnology).
- What this shows is that:
 - o The EU's approvals are paid attention to by companies and that the EU as a major trading block can take a proactive approach in this regard
 - o Monsanto and the biotechnology industry are clearly building up pressure, to the extent that they threaten contamination of shipments to Europe, rather than taking steps to avoid it and therefore themselves putting the EU livestock industry at risk.

The build up of pressure on the EU is more about the commercial interests of Monsanto (who markets the

vast majority of GM crops in the world), other biotech companies and US farmers than it is about safeguarding the EU livestock industry:

- Monsanto needs to get its new GMO marketed as soon as possible because “First-generation GM varieties are now beginning to lose their attraction as resistance to their traits begins to build.”, according to the Journal Nature Biotechnology in a clear admission of the environmental and agronomic problems caused by these crops. It is therefore not surprising that there is such a strong push from industry to get zero tolerance dropped in the EU and to speed up approvals.
- US farmers have seen their exports to the EU drop since GMO were first introduced and have been harmed by contamination problems (contamination from experimental GM rice in August 2006 and with GM maize in 2007) because of the US government’s and companies’ inability or unwillingness to put traceability and segregation channels into place.

“I think the debate about higher prices and being able to meet the demand of people in the world for food is a perfect opportunity to make the case (for GMO crops)...We may have a window of opportunity here and I would encourage you to exploit that”

— Bob Stallman, president of the American Farm Bureau Federation speaking to the NFU conference 2008.

4. Will the EU’s GMO laws mean that animal feed imports are blocked?

In order to address this question, GMO approval systems around the world need to be looked at in order to assess whether the EU is approving GMOs for import much slower than producer countries

- United States

When a company wants to commercialise a GMO in the US, a safety assessment is only required if the company presents evidence that this is needed. Unsurprisingly, no company has chosen to do this up until now. GMO commercialization in the US therefore occurs under a total absence of health and safety procedures. The US process for authorising GMOs does not meet international requirements under the United Nations’ Codex Alimentarius, which are considered as the standard by the World Trade Organisation’s trade dispute body. Furthermore, the US is not a signatory to the UN’s Biosafety Protocol.

The US Department for Agriculture (USDA), the regulatory agency with primary responsibility for biotech crops, has come in for unusually harsh criticism from the National Academy of Sciences (NAS,2002), its own Inspector General (USDA IG, December 2005), and many farm and public interest groups for failing to adequately assess and regulate biotech crops. Since just 2006, three federal courts have also found USDA’s regulation of GM crops to be grossly deficient and not compliant with U.S. environmental laws. In one case, USDA was found to have violated both the National Environmental Policy Act and the Endangered Species Acts for allowing several companies to grow GM crops that harbour untested pharmaceuticals in Hawaii without first conducting an environmental assessment.

- European Union

The EU has a relatively robust regulatory procedure for authorizing GMOs onto the market. This provides the opportunity for a scientific dialogue in an area of risk assessment where there are still major gaps in scientific understanding.

- Brazil

Contrary to the US, Brazil has stricter GMO laws based on the UN’s Biosafety Protocol.

- Argentina

Concerning Argentina, the Commission’s DG Agriculture, has itself acknowledged that Argentina has historically been unwilling to authorize GM crops prior to EU approval and that the likely impact of the GM crop on exports is a consideration in the approvals process.

- China

China also has a more precautionary approach to GMOs than the US, and is getting stricter:

- The Chinese Agricultural GM Crop Bio-safety Committee has been reorganized to include members specialized in environmental and biosafety issues
- Certificates for GM commodities can only be granted for a maximum of five years, and are usually granted for three years or less ii.
- Any GMO imported into China must have proof that it is approved for commercial production in the exporting country
- Once a company has requested approval to commercialise a GMO the Ministry of Agriculture has up to 270 days to reach a decision, therefore much longer than in the US
- China has legislation requiring the return or destruction of food imports that contain unapproved GM materials, incorrectly labelled GM materials or materials labelled as non-GM which are discovered to contain GM material iii.
- Beijing is considering legislation that would put in place monitoring of GM foods and require importing companies to bear the cost of recalling foods found to contain illegal GM materials iv.
- Furthermore, Kraft foods, the world's second largest food supplier, has announced that all foods produced on the Chinese mainland will not contain GM material v.

Contaminated EU imports: the Case of Herculex GM maize contamination

Despite the acknowledgement that sourcing maize does not pose a problem for the EU, the case of US imports contaminated by GM Herculex maize (DAS 59 122) has been widely used as an example of how zero tolerance cuts of animal feed supplies to the EU

Maize exported from the US, destined for the EU, was found to be contaminated with Herculex, a GM maize commercialised in the US but not in the EU. However, by April 2007, just a few months prior to the EU approving this maize, none of the countries from which the EU imports most of its maize – Argentina, Brazil, Serbia and the Ukraine - had authorised Herculex. Whilst contamination was found in imports from the US and refused at port, this refusal in no way shut down the EU's major suppliers.

It should also be noted that whilst maize and soy are the main focus for DG agriculture, some parts of the livestock industry are also subject to rising costs of other agricultural commodities.

Because most of the cost of producing pig meat is the feed, the pig industry has been at the sharp end of feed price rises. EU pig feed consists mainly of wheat. It also contains some barley to provide carbohydrates and soy for protein. In the past year or so the price of feed wheat has more than doubled. The price of soy has also increased, but not as significantly.

The industry in the UK has predicted that is leading to an increase in overall feed costs of 76% and total production costs of about 34%. It recognises that the price rises are as a result of a combination of "relatively poor harvests, increasing import demand from fast developing countries and the global rush towards biofuels". GMO wheat is not grown commercially anywhere in the world. Even in the US the wheat industry lobbied Monsanto not to commercialise GM wheat for fear of losing exports to the EU. There is therefore no argument that GMOs will solve the crisis faced by pig farmers. Even the pig industry realises this and is instead calling for increased prices for farmers, and for supermarkets to pass more of their profits back down the supply chain. In the UK, the industry claims this would equate to a price increase for consumers of between 7p and 17p (10-22 euro cents) per pack of bacon or other pork product. (The Impact of Feed Costs on the British Pig Industry, September 2007, British Pig Executive <http://www.pigsareworthit.com/Feed%20Report%20V4.pdf>)

5. Conclusions

- The difference in timings (asynchronous approvals) is between the US and the rest of the world, not between the EU and its main exporter countries.
- The US is isolated in terms of GMO approvals process with Brazil and China being closer to the EU in this respect. Argentina assesses export opportunities as part of its approvals process
- The Chinese domestic market is showing sensitivity to GM-free food and it can therefore not be taken for granted that China will import GMOs that the EU won't
- Weakening EU law on GMOs will not help the EU livestock industry. Real and urgent solutions are needed for the livestock industry.
- The main GMO in question, Monsanto's GM soy, is currently going through the EU's approval process and the biotech industry is not preparing for large-scale marketing until it has EU approval. There is therefore no rush to change EU procedures.
- If the EU drops zero tolerance it will open up the risk of contamination of imports with GMOs that have had no health or environmental risk assessment and which could be from experimental sites or GE pharma crops. This is contrary to the principles of EU GMO laws and will further weaken global standards
- Watering down EU GMO legislation will be controversial and unpopular with the European public

6. What should the EU do?

- Zero tolerance and the speed of GMO approvals do not need to be changed. These issues will not make any difference to the EU livestock industry's current crisis. Any decision to weaken GMO laws will be controversial and unpopular with the European public.
- Instead of speeding up approvals to match the US, provide support and technical assistance to countries such as China, Argentina and Brazil to establish GMO assessment procedures comparable to international guidelines and the EU's own standards.
- Allowing contaminated exports into the EU will increase contamination around the world and reduce even further the opportunity of GM-free animal feed which is supported by the majority of EU consumers and many developing countries. One million Europeans signed a petition in 2006/7 calling on animal products from animals fed on GMOs to be labelled
- As a leading trading block, the EU must specify to producer countries what the EU will import, encourage GM free production, and the limitation of new GM cultivation
- The EU must also help the EU livestock industry to source GM free animal feed and must reform agricultural and trade policies in order for European farmers to reduce their reliance on imported animal feed
- Develop strict traceability and liability systems whereby the biotech company - the polluter - not the feed importer, farmer or consumer, pays for unauthorised GMO contamination
- Drop the EU target that all fuels for transport contain at least 10 percent by 2020

Endnotes to the above briefing:

- i "Economic Impact of Unapproved GMOs on EU feed imports and livestock production", DG Agriculture, June 2007
- ii Biosafety Clearing House of China website <http://english.biosafety.gov.cn/>
- iii Regulation on the Inspection and Quarantine of Import and Export of Genetically Modified Commodities: promulgated by Decree No. 62 of the Director-General on May 24, 2004 Available at the website of the National Biosafety Clearing House of China: <http://english.biosafety.gov.cn/>
- iv Beijing plans to make food makers, sellers accountable for safety China Daily 26/07/2007 http://www.chinadaily.com.cn/2008/2007-07/26/content_5443898.htm
- v Jie L (2007) No Compromise China Daily 24/09/2007 http://www.chinadaily.com.cn/bw/2007-09/24/content_6128106.htm

Partial list of EU retailers who exclude or restrict meat, poultry and dairy produce from livestock fed on GM ingredients, as of June 2007:

IRELAND: All of Marks & Spencer's fresh meat and poultry, salmon, shell eggs and fresh milk comes from animals fed on a non-GM diet. The **Kepak Group**, which controls 60% of Irish beef exports, requires some farmers who produce meat for its flagship **KK Club** brand to exclude the use of GM animal feed. All Kepak's chicken meat comes from birds reared on a vegetarian non-GMO diet. The **Silver Pail Dairy** in Co. Cork has signed multi-million euro foreign direct investment deals with **Baskin Robbins** (the world's largest ice-cream retailer) and with **Ben & Gerry's**, to produce GM-free ice cream (made from milk from cows fed a certified non-GMO diet) for the European market. **TLT International** in Mullingar exports thousands of non-GMO-fed live store cattle yearly, mostly to Northern Italy. All Irish organic meat and dairy produce also avoids use of GM animal feed, including **Glenisk** which secured €5m in foreign direct investment to expand its share of the EU market and whose new organic manufacturing facility will be unveiled by the Taoiseach Brian Cowen on 7 July.

UK: Tesco, Sainsburys, M&S and Budgen Stores all have quality labels for meat and dairy produce from livestock fed on certified GM-free animal feed. All of **Marks & Spencer's** fresh meat and poultry, salmon, shell eggs and fresh milk comes from animals fed on non-GM diet. Moreover, standard poultry sold in most UK supermarkets now carries a label certifying GM-free feed. The UK has over 40 GM-free zones including Scotland, Wales, and Cornwall.

FRANCE: Carrefour, Cora, Auchan and Monoprix all have quality labels for meat and dairy produce from livestock fed on certified GM-free animal feed. GM crops are banned by many regions and local authorities.

GERMANY: Most retailers avoid GM-labelled food. A well-known leading supermarket chain is expected to exclude meat and dairy produce from livestock fed on GM ingredients later this year. A second leading retailer is considering the same, beginning with pork meat, but for reasons of corporate social responsibility, rather than marketing.

ITALY: The largest retailer, **Coop Italia**, already has a quality label for meat and dairy produce from livestock fed on certified GM-free animal feed. GM crops are banned in most Italian Regions, including Tuscany where anyone found growing GM crops faces two years in prison or a € 50,000 fine.

SWITZERLAND: The two largest retailers, Migros and Coop, systematically ban all GM food - including meat, poultry and dairy produce from livestock fed on GM feed, in their supermarket brands. Following a national referendum, the Swiss government implemented a five-year moratorium on GM crops and livestock in 2006. This was extended in 2008.

POLAND: Europe's largest agricultural producer has imposed a total ban on GM crops, and also plans to prohibit GM feed by 2008 unless it is scientifically proven to be safe. Farmers have imported certified non-GMO soya since 2006 for their pork meat bound for the German market.

ATTACHED DOCUMENTS:

Map of GM crop cultivation around the world in 2008.

Facts and figures about genetically modified organisms.

Flaws in the EU authorisation process for GMOs.

Environmental and health impacts of GMOs: the evidence.

The social and economic impacts of GMOs.

GM crops around the world – an accurate picture. GM Freeze, June 2008.

Feeding the world with GM crops: Myth or Reality. GM Freeze, June 2008.

The rise of animal feed prices and potential impacts in the EU: causes and links to GM policy. FOE, Dec. 2008.

EU animal feed imports and GMO policy. CPE / FOE / Greenpeace, May 2008.

Greenpeace letter to Heads of State and Governments on the food price increase, 16 June 2008.

GMO Approval procedure and zero tolerance regime and the economic consequences thereof: EU Parliament Committee on Agriculture and Development, ASP, A3E-2: exchange of views with experts: statement by Jochen Koester, Geneva.

Excerpt from the "Executive Summary of the Synthesis Report of the International Assessment of Agricultural Knowledge, Science and Technology for development (IAASTD).

Who will feed the world? Towards diverse, sustainable forms of agriculture as drivers of sustainable development. Greenpeace briefing.

Solving the global food crisis. Media briefing, FOE, May 2008.

EU food agency under fire as Commission debates GMOs - FOE / Greenpeace, 7 May 2008.

Commission vote of no confidence in EU safety authority - Greenpeace statement, 7 May 2008.

Open letter to support DG Environment's reported proposal on the cultivation of genetically modified maize cultivars in the European Union.

Greenpeace reaction to June FAO declaration — 6 June 2008.

Farming with nature, farming for life, by Gerd Leipold, Executive Director, Greenpeace International.

Economic Impact of Unapproved GMOs on EU Feed Imports and Livestock Production — DG Agri report Growing debate on GM. Ann Cahill, Irish Examiner, 27 June 2008.

Aarhus Convention: list of documents + letter to party concerned re. communication ACCC/C/2006/17 + related finding of Compliance Committee on applicability of the Convention to the Republic of Ireland.