

FROM: Shirley Clerkin
Natural Environment Officer
An Taisce

TO: Dr. Barry O Reilly
Secretary
Interdepartmental working group on co-existence
Department of Agriculture and Food
National Crop Variety Testing Centre
Backweston
Leixlip, Co. Kildare

DATE: 12 November 2004

RE: Consultation process for National Strategy on co-existence of GM crops

Dear Dr. O Reilly,

In relation to your letter dated 18th October, 2004 and following our first meeting with you on the 23rd September, An Taisce wishes to make the following points:

An Taisce considers that the consultation process is fundamental to the outcome of the co-existence strategy and that the environmental stakeholders need more time to formulate our their position on this complicated issue. An Taisce is also concerned that the list of stakeholders and other "interested parties" involved to date in the consultation process is not adequately comprehensive. You will no doubt appreciate the multi-disciplinary approach that is required in order to fully understand all the issues involved, and the time that this takes.

An Taisce wishes to ensure that its position takes cognisance of all current scientific information and the precautionary principle where gaps in knowledge or certainty exist. The release of GMOs into the environment may have far reaching consequences and it is imperative that our submission to your working group is comprehensive.

We therefore request:

1. An extension of time for the first round of submissions. We recommend that the date be extended to 17th December 2004.
2. We are concerned that you wish to 'finalise your report'. This seems to imply that your report is almost complete and that an attempt is going to be made to somehow integrate our submissions into it. We do not agree with this 'top-down' approach to environmental decision making, neither is it in line with best practice as described in the Aarhus Convention or Agenda 21. We recommend that the final date for the final round of submissions be extended to at least 31st May 2005, and that a proper consultation process be put in place in the interim.

Yours sincerely,

Shirley Clerkin
An Taisce.