



Dr. Barry O'Reilly, Secretary
Department of Agriculture National Crop Variety Testing Centre
Backweston, Leixlip, Co. Kildare

11 November 2004

Re. GM-free Ireland Network submission on "co-existence" of GM crops with conventional & organic farms

Dear Dr. O'Reilly,

Thanks for your letter of 18 Oct. requesting our written submission by 12 November. Because Ireland's strategy on GM issues will have enormous economic, ecological and health impacts on the future of Irish food and farming, we are reading hundreds of documents, preparing a series of detailed position papers in consultation with the 36 organisational members of the GM-free Ireland Network (which now collectively represent over 20,000 farmers, food producers and consumers), and planning a formal exchange of views with the other stakeholder groups who will be affected by the national strategy on GM issues.

We are thus astonished by your request for a 12 November deadline, and shocked by your intention of finalising your own report by the end of November. Much more time is needed for the unfolding stakeholder consultations on this very complex issue, as a hasty decision could create havoc down the road:

- A decision to allow the commercial release of any GM crops in Ireland will be an historic one whose consequences (including the economic impact on farm exports) would be irreversible.
- The biotech lobby's continued effort to market their controversial GM food and crops is countered by abundant evidence of health and environmental problems, crop failures, GM contamination, corporate lies, government cover-ups, the lack of long-term health studies, insurance companies' refusal to cover disaster risks, biopiracy, massive lawsuits against biotech companies by contaminated farmers, product recalls, widespread rejection by consumers and retailers, national, regional and local laws banning GMOs, and the current GM trade dispute at the WTO.
- The European and international legal context is shifting, with (a) the WTO's recent admittance of the need for scientific advice in the GM trade dispute filed by the USA, Canada, Argentina against the EU, (b) the European Association of Regions campaign for major changes in related in EU law.
- In order to forge a GM policy that meets the interests — and thus has the full support — of the citizens who will be affected by it, the stakeholders need to: (a) become reasonably well informed on the relevant issues in genetics, agriculture, ecology, health, economics, politics, law, food security and sustainability; (b) exchange views amongst themselves; and (c) reach consensus.

The design of the current multi-stakeholder consultation process on GM issues fails to comply with applicable international laws and agreements including the Cartagena Protocol on Biosafety, the 1992 Rio Declaration, and the Aarhus Convention — which require the development of participatory democracy and environmental democracy, through the active engagement of civil society in all environmental policy-making. Public participation involves a real partnership between civil society organisations, and public authorities so as to forge policies that embody the eco-social interests of the affected stakeholders. The process should be timely, effective, adequate, transparent and formal, and involve communication and feedback with due dialogue, consideration, and response. International best practice shows that while top-down policies usually don't work, those which are forged by the stakeholders — and thus "owned" by them — are most successful. Our first submission will include detailed proposals for a more democratic consultation procedure to produce a national strategy the Department of Agriculture can be proud of.

We therefore hereby request that you (A) extend the deadline for a first round of submissions until 17 December 2004 (with notice of the same to be sent to all the other stakeholder groups on your list) and (B) extend the deadline for final submissions to 31 May 2005. We trust you will agree to this request, as failure to do so will result in complaints to the Ombudsman and the EC.

Yours sincerely

Michael O'Callaghan
On behalf of the GM-free Ireland Network
www.gmfreeireland.org

