

# IRISH ORGANIC FARMERS AND GROWERS ASSOCIATION

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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

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November 11<sup>th</sup> 2004

Dear Dr.O'Reilly,

The board of IOFGA has discussed the operation of the co-existence working group in detail and it has come to the conclusion that, considering the importance of the subject, the approach it has taken is inadequate.

The list of stakeholders does not reflect the fact that the growing of GMO crops in Ireland will have effects on every single citizen of this country. The board believes that bio-safety, biodiversity and other environmental aspects must be included in any decision-making on GM crops. In addition the economic viability of farms which do not embrace the GM technology is under serious threat. In our opinion these matters are not adequately reflected by the "consultation" process so far.

We strongly request a re-think of the consultation process in order to develop a procedure which reflects not only the above points (which are by no means comprehensive) but also complies with Ireland's obligations under international agreements and is in line with best practice internationally.

For the above reasons IOFGA seeks to have today's closing date for final submissions extended to accommodate such a consultation process.

Yours sincerely,

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Richard K. Auler  
For the board of IOFGA