

# ENVIRONMENTAL POLICY FORUM

c/o CIEEM, 43 Southgate Street, Winchester, Hampshire, SO23 9EH  
Tel: 01962 868626 Email: [jason@cieem.net](mailto:jason@cieem.net)

Rt Hon Owen Paterson MP  
Secretary of State for Environment, Food and Rural Affairs  
Defra  
Nobel House  
17 Smith Square  
London  
SW1P 3JR

27<sup>th</sup> June 2013

Dear Secretary of State,

## GENETICALLY MODIFIED (GM) CROPS AND TECHNOLOGY

The Environmental Policy Forum (EPF) is a network of UK environmental professional bodies promoting environmental sustainability and resilience for the public benefit. The EPF's member bodies have a collective membership of around 40,000 environmental professionals, many of whom are individually chartered in environmental practice, science and engineering disciplines.

With reference to your speech of 20<sup>th</sup> June 2013 on genetically modified (GM) crops; we welcome the debate on the topic and agree that the UK must play its part in ensuring sustainable food security both for itself and for the world.

We agree that the UK can and should be a centre for research excellence in this subject, and we support necessary and appropriate R&D which adds to the UK's excellent research base and provides the right opportunities for the appropriate commercialisation of UK R&D around the world.

We urge you to encourage continued research efforts in this area and promote a clear and transparent dialogue with regulators, agribusiness, environmental scientists and ecologists. All parties need to be aware of the science and uncertainty so proper risk assessment can be made. The expressed aim throughout should be to have a balanced approach that maximises the long-term public and environmental good. **We offer our support in communicating these scientific principles and decisions to the public.** Only through this method will all parties build trust around GM in the scientific community and public.

GM crops promise to feed the world – for example through developing drought-resistant and salt-tolerant varieties – but the majority of GM crops have been developed for just two traits – herbicide- and pest-resistance. There is some evidence to suggest that these two traits may cause more problems than they solve, for example, by fostering resistance in weeds – much like the worrying rise in antibiotic resistance in human medicine.

Herbicide-resistant traits can be exploited to allow blanket spraying with herbicides without damaging the target crop. In addition to the possibility of promoting herbicide resistance in weed species, over-spraying of pesticides and herbicides also causes additional damage to the natural environment. For example: damage to soil organisms, farmland wildlife in general and has downstream effects through herbicide runoff into water systems.

Any commercial roll-out of GM crops will need to take place in a **well-defined regulatory environment that appreciates both the science behind the technology and also its application.** This must also take account of behaviour changes within the farming

community that could arise from the use of GM crops—i.e. through ensuring that farmers adhere to scientific advice with respect to herbicide and pesticide use with GM crops.

As the effects could be so detrimental to the UK's natural environment, we are fully in support of the firm application of the precautionary principle.

Public trust must be obtained if GM technology is to be accepted. This will require robust, evidence-led and transparent processes for approval for use and clear labelling systems for products. We call on you to urge agribusiness to publish the statistical likelihood of known negative effects in their trials. We offer our support in communicating these scientific principles and decisions to the public. Only through this method will all parties build trust around GM in the scientific community and public.

We welcome the debate on GM crops and technology, but this must not be at the expense of a wider discussion on food waste, changing dietary behaviours, and human population growth and consumption.

The EPF urges you to consider these matters with your Cabinet colleagues the Secretaries of State for Business, Innovation & Skills; Health; Energy and Climate Change; Communities and Local Government (and with your counterparts in Scotland, Wales and Northern Ireland) in order to develop a more holistic and cohesive policy on GM which puts environmental sustainability first.

If you would like to discuss these and other related matters we would be delighted to meet you. The EPF is committed to assisting the Government with its GM policy, helping it to meet its environmental priorities and food security targets.

Yours sincerely,

Jason Reeves ACIEEM  
Policy and Information Officer  
Chartered Institute of Ecology and Environmental Management

For and on behalf of:

Professor William Pope CEnv  
Vice President  
Institution of Environmental Sciences

Alastair Chisholm  
Policy Manager  
Chartered Institution of Water and Environmental Management

Dr Peter Spillett CEnv  
President  
Institute of Fisheries Management