

The response reproduced below was submitted further to an invitation to comment on the draft Discussion Paper by the Nuffield Council on Bioethics: *The use of genetically modified crops in developing countries*, during June to August 2003. The views expressed are solely those of the respondent(s) and not those of the Council.

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Report: "The use of genetically modified crops in developing countries" Comments on the draft

1) "We therefore affirm the recommendation made in our 1999 Report that genuinely additional resources be committed by governments, the European Commission and others, to fund a major expansion of public GM-related research into tropical and sub-tropical staple foods, suitable for the needs of small-scale farmers." (page IX and 191/67)

Such funding should include support for regulatory approval, both in the countries where such crops should be grown and where they could be exported (or even end up as commingled products). Also, such research effort should be strictly targeted to very few high need and low risk modifications. In relation to "biopharmaceuticals" (86/30), research spending should be conditioned on lack of comparable alternatives.

2) "We recommend that the EU, the Department for International Development (DFID) and appropriate non-governmental organisations who monitor agricultural policy of developing countries pay particular attention to the consequences of EU regulatory policies for GM crops. Developing countries may be reluctant to explore the possible benefits of using GM crops in particular instances because of the implications of EU policies. Potential adverse effects need to be examined and we recommend that the EC establish a procedure to report on the impact of its regulations accordingly."

Such recommendation should be extended to other countries, including the US, Japan and other developed countries. In fact, experience with trade issues suggests that the US and other countries would be no less stringent than the EU in prohibiting imports of GM crops or crop products that are not approved internally. The US GM-positive attitude may also misguide countries into approving locally developed GM crops that would still need to go through the lengthy and expensive US regulatory process (for which resources may not be available).

It should be stressed that, unless an international mechanism (such as the Cartagena protocol article 11 procedure) is widely accepted and applied, it will be difficult to suggest that developing countries accept GM plants that have been developed for their specific needs-when they may face rejection in the developed world (all countries included).