

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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Overall a very balanced commentary on the current situation. However, should emphasise the need for flexible biosafety regulatory structures, especially for the least developed countries. These countries have three types of agriculture: subsistence, for internal market and for external markets. The International regulatory requirements for the first two are the Convention on Biological Diversity Article 8(g)

Each Contracting Party shall, as far as possible and appropriate:

(g) Establish or maintain means to regulate, manage or control the risks associated with the use and release of living modified organisms resulting from biotechnology which are likely to have adverse environmental impacts that could affect the conservation and sustainable use of biological diversity, taking also into account the risks to human health.

The underlining is my own and show the possible flexibility of this article. For instance, it may be more risky to human health to procrastinate in adopting an internationally accepted regulatory structure than in setting up one appropriate for the country and its technical infrastructure

Specific comments:

Para 47. Although there is lack of evidence of GM introgression into the natural environment (whatever that is) there is a need for baseline information on introgression of non-GM crop genes into related species in centres of diversity

Para 87. This need to be stronger and emphasise that special agronomic facilities will be required for specialist transgenic plants such a those producing pharmaceuticals and some industrial products. As with all GM crops one should adapt the farming practices to the crop and trait rather than impose the crop onto an existing system.

Para 126. These is no mention of mycotoxin production, especially in nut and grain crops following insect damage. My understanding is that mycotoxins cause considerable human health problems in Africa and Asia.