

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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Re Draft for Comment, June 2003.

The Use of Genetically Modified Crops in Developing Countries.

COMMENTS

I. General and Introductory Comments.

1. This draft came to my notice only a few days ago. I am very much taken aback that as a respondent to your 1999 Report 'GM Crops' you have not notified me directly at the appropriate time.

2. This draft comes at a very unfortunate time because:- a) So many weighty consultation papers and the Public Debate make substantial responses difficult. b) The draft should have appeared earlier so that your Report could have informed the Debate at a time when the meetings were held. c) It appears that the three strands of the Public Debate i.e. the Science Review, the Cost and Benefits Report and the Public Debate involving UK citizens together with the FSA report on GM and this one had been strategically planned to have maximum impact on Government Ministers. There appears to be a political motivation behind the timing.

3. In addition, there is circumstantial evidence that this draft may not be unconnected to President Bush raising similar themes in relation to Africa and hence pushing the European Commission to lift the Moratorium on GM food and threatening a trade war regarding GM foods.

4. In this light, the similar deliberations at the Agriculture and Environment Biotechnology Commission may have their origin in subtle lobbying by a political source.

5. The topic is not central to the concern of the Public Debate and there is little substantive reason to pursue it. There seems to be a political reason as far as the contents are concerned in addition to the timing.

6. It is quite unwarranted that yet another attempt is made, this time by the Nuffield Council on Bioethics, to influence the Public Debate in this country in favour of GM crops by focussing on developing countries.

II. Comments re Council Membership and those mentioned under the heading Acknowledgement.

It is unacceptable that professional areas of interest are not listed under the heading of Acknowledgements. This is common practice - see FSA members interests. This would also include shares and other interests which are relevant also for Council Members.

II. Comments on the Terms of Reference

1. There are no references made in the Draft as to the 'Recent advance in biological and medical research' and the reader is left in the dark as to what you have included or excluded. Four years have passed since your last report.

2. To 'respond' to 'public concern' in anticipation of such concern is highly unscientific and lacks the clout of independent scientific rigour. We would suggest you had pursued something like: critically examine the evidence of

3. 'To make representations' implies that you are planning to be active in what is a highly political issue.

4. Your terms of reference are largely reactive as far as scientific scrutiny is concerned and it is therefore inherent in your procedure that you reiterate arguments, which have been made and rehearsed before. There is much repetition of lines of thought and conclusions in the report relating to 1999 and that after so many years of research. This is not satisfactory.

III. Comments re Invitation to Comment, p v.

1. It seems to be highly questionable to publish a Draft with the foregone conclusion that 'there was a moral imperative for making GM crops available to those in developing countries who wanted them'. Your argument in the Draft seems to be geared to come to that conclusion. I therefore have no trust in those scientists who play the game of the pro-GM lobby, which pervades our Government at Cabinet level and the dominant Scientific Community.

2. The Public Debate has its focus on GM commercial growing in the UK. To bring 'poorer countries' into this picture and use this approach to rehearse much of the general debate relating to this country is an unacceptable ploy with a hidden agenda.

IV. Comments re Acknowledgements.

Here I miss some notable names of independent scientists and recognise some with dedicated pro-GM views.

V. Comments re the Executive Summary.

1. You state that the purpose of this Draft is 'to assess the potential risks and benefits associated with GM crops in developing countries' In doing so, you over-emphasised the potential and mainly short-term benefits and overlooked the growing evidence of plain failures and you underplayed the risks.

2. Your recommendation 'to fund a major expansion of public GM-related research' totally overlooks viable and valuable alternatives more suited to developing countries.

3. You are polarising your stance as against the NGOs and overlook the substantial evidence gathered by independent scientists. This is extreme bias. This Draft is designed to become a political tool at the EU and Department for International Development level. This clearly shows the underlying reason for this Draft. It is a clear expression of the pro-GM lobby.

4. This Draft is ostensibly a sales promotion and the majority of arguments throughout the Draft are treated in such a way as to satisfy this GM promotion in very subtle but consistent ways.

5. The 'micronutrient-enriched GM crops' (see p xi) are another GM-lobby hobbyhorse bandied about in Research Stations. Here we have again unrealistic self-serving projections. The repeated use of 'could' and 'can', 'is likely',

'would'. 'might' 'may' is the promotional language of the protagonists of the GM mentality. How many kilos of Golden Rice have to be consumed to be effective and what has happened to the indigenous food plants, accessible to the poor, which in the past were rich in vitamin A? This is not scientific language and lacks true application of the precautionary principle to which this Draft pays lip service only.

VI. Comments on Section 1, Introduction.

1. It is deplorable that the Nuffield Council on Bioethics calls their opponents in the GM Debate as 'scare mongering'. We have met many a serious scientist who is using an evidence-based rational assessment to point to serious risks of GM crops in terms of the technology used and otherwise. This Draft, whilst appearing to be 'more balanced and open' is in reality extremely biased. However, on occasion, the Draft brings in some more balanced opinions in as much as it refers to the problem of making generalisations re GM crops and allows for the possibility that non- GM crops may be 'safer, more efficient or more economic'. Yet this latter line of thought is not further elaborated, whilst the GM one is monopolised to a high degree.

VII. Comments on Section 3.

1. Re Naturalness. It is interesting to look at the methodology used in this section. Each objection by 'critics' is counter-argued by this paper and hence refuted. This technique, however, shows its additional bias when certain topics are not raised, such as the arbitrariness of gene insertion within the genome, the adaptability of nature to undo the intention of the gene transfer, the inherent problems of a sudden GM manipulation as against manipulations over long periods of time and others. The Draft consistently defends the GM procedure against the 'critics'. There is no balance. The GM transformation remains essentially 'unnatural' and there lies the problem for which evidence of negative consequences will by necessity come to light in due course. The principle is not dissimilar to BSE and the unnatural feeding procedures used. The level of thinking underlying the Draft is far from thorough, moreover, it is misleading on several counts.

2. Re commercial use of GM crops. I note that there is not a single critical comment re commercial use. Yet it is well known that there are failures and problems of many kinds. This Draft is not objective and grossly misleading to the reader and eventually relevant authorities.

3. Re the Case Studies. These case studies are very selective to make the point for GM crops, no failures are mentioned. The words 'can' 'potential' 'expected' 'possibilities' 'it is hoped' 'could' 'may' show the hypothetical nature of the claims made and there is little evidence that the gene transformation actually produces any results, not to speak of the problems that will occur by necessity over a period of time.

VIII. Comments re Section 4.

1. The effect of Gene Flow is underplayed by the Draft.

2. The Precautionary Principle as described here is being degraded by intensive lobbying negotiations so as to become nearly meaningless. The gene manipulation process itself as well as its applications contain serious dangers which need to be evaluated by an examination of probabilities. This, however, is not in the interests of powerful GM companies nor to scientists who are focussed on increased yields and their own career.

3. The assumption that there is not enough evidence to justify a moratorium is wrong on two counts at least. One; there is evidence that there is a dearth of relevant research being done. Two; where adverse evidence of such research comes to the surface, such evidence is being silenced, the researchers dismissed and the research discontinued. In other words, the evidence which is already emerging is being ignored and killed off. Substantial evidence is emerging to suggest that such a moratorium on the release of GM plants should be demanded in the public interest.

IX. Comments re Section 5.

1. It is noteworthy to stress that the US is not part of the Cartagena Protocol. This would be against its financial interest in the GM business. Moreover, the US is threatening a trade war via the WTO against the EU. This exposes the drive for GM proliferation on a commercial level as being underpinned by national and financial interests.

2. I strongly object to the most misleading statement made in section 161 about the positive attributes of GM crops and to omitting the problems and thus to 'oppose a ban or moratorium on the planting of GM crops in developing countries'. There is sufficient doubt to support a moratorium regarding the planting of GM crops.

X. Comments re the Summary of the Draft, Section 7.

1. This Summary takes for granted the safety of GM food and crops, as indeed the Nuffield Report of 1999 does. Four years have passed since then and the Nuffield Council on Bioethics has not highlighted the lack of relevant research in the area of safety. Neither has it mentioned the evidence of serious problems as raised in publications such as 'Seeds of Doubt' by the Soil Association or the transcripts of the Chardon LL Public Hearing, the latter having been conveniently dismissed by the Advisory Committee on Releases in the Environment (ACRE). This topic is too serious to be brushed aside.

2. The summary criticises the 'restricted international and regional trade policies relating to GM crops' by the EU. This is a plain attack on political institutions which 'apply the precautionary principle' on behalf of their inhabitants. They present legitimate concerns of the safety of GM crops and food to humans, farm animals and the environment. In making this attack, the Nuffield Council makes itself into a protagonist for the interests of the GM lobby.

3. The members of the Nuffield Council and particularly those of the Draft's working group and those who assisted in the Draft will be largely attached to Universities and Research Stations. It is feasible that this Draft, which will become a Report, is serving a self-interest. This document makes the request 'to fund a major expansion of GM related research . . . '(see p67).

4. The Nuffield Council on Bioethics has eliminated in the present Draft and Summary a number of good recommendations made in the 1999 report 'Genetically Modified Crops', see the chapter 'Commercialisation and Developing Country Issues'. This is very inconsistent and begs the question 'why?'
5. Some members of the Nuffield Council are likely to side with the views of Lord Sainsbury who sits in the Cabinet GM Subcommittee together with Margaret Beckett and who wields much power in allocating public funds as Science Minister. He is reported a) to be the biggest donor to New Labour and hence elevated to a peerage and b) to have a multimillion-pound interest in pushing the GM issue.
6. The Biotechnology and Biological Science Research Council (BBSRC) which funds British Universities' research to the tune of 190million pounds per annum, has an extremely strong pro-GM policy and makes 'fierce attacks on the critics of GM engineering' (see Montbiot 'Captive State' p291). Members of the Nuffield Council and individual advisors would not escape the attention of the BBSRC when making any critical comments.
7. The dominant science community has been cleansed of scientists who make valid criticisms and the Nuffield Council has supported this process, see appendix 1 of the 1999 report which deals with the story of Dr Arpad Pusztai.
8. The Draft and Summary focuses nearly exclusively on GM issues, thus monopolising research in this direction. The developing countries need much more than this. A variety of approaches, particularly organic ones need much more focus and funding. They are less problematic for poor farmers in the longer term on several counts.
The Draft overlooks that the GM construct tends to be inherently unstable over time. The evidence of this is now emerging, but is apparently ignored by this Draft. The underlying reason for this instability is that the paradigm of the GM scientist tends to focus on the gene and to overlook the genetic interactions within the genome. This scientific framework is therefore faulty and begins to show up in lesser yields, unfulfilled promises and failures.
9. The Draft and Summary gives little attention to the liability issue and the invasive nature of GM plants.
10. I most strongly contest the Summary's conclusion that there is 'an ethical obligation to explore the potential of GM crops in developing countries'. This conclusion is based on inadequate analysis, pro-GM bias of a remarkable degree and unscientific procedures.
11. This Draft and Summary appears to me as an apologia for GM proliferation per se and a politically motivated drive to convince an already pro-GM Government to force GM crops into the UK against the wishes of the vast majority of its citizens. I sincerely doubt the independence and integrity of the Nuffield Council on Bioethics.

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