Dear Commissioner John Dalli,

We are writing to express our disappointment with the report DG SANCO launched on 15th April about the impacts of the cultivation of genetically modified crops across Europe. In our view the report substantially failed to reflect the request of the Council of Environment Ministers from December 2008 to ‘collect relevant information on socio-economic implications of the placing on the market of GMO’s including socio-economic benefits and risks and agronomic sustainability’. We would therefore like to use this opportunity to highlight the failings and inaccuracies in this report.

In our opinion the report has a long list of weaknesses:

1. **Wrong methodology:**
   A. The report does not define what is meant by socio-economic impacts. It does not refer to any existing definition of how the socio-economic impact could be defined nor does it describe its own criteria used in the survey of member states, nor does it anyhow reflect the EU guidelines for impact assessment.
   B. No base-line data is given. This is necessary to carry out a proper impact assessment.
   C. The questionnaire sent to member states gave them no possibility to comment or to describe the impact of GM crops outside their country.
   D. The report is focussed only on single farms within the EU and not on the whole EU food chain. Stakeholders other than farmers cultivating GM crops have been completely ignored, including conventional farmers, food processors, millers, retailers and beekeepers.

2. **Lack of content:**
   A. An analysis of the economic and financial consequences of the introduction of GMOs to the market for different stakeholders is missing, as is any data on the impacts on farms, food processors or retailers in the EU.
   B. The official results of the EU’s own research are not included. For example, the EU’s research programme on co-existence and traceability (Co-Extra) has estimated that additional costs can increase to 13% of total product turnover (based on limited data on the economic impacts of GM crop).
   C. The paper fails to address any wider socio-economic implications, such as the economic burden for avoidance and segregation costs for the food industry (operating costs, investments, administration costs, and consequences for the sector). Public bodies also have significant expenditures in terms of monitoring and regulating food and feed imports, seeds and consumer products (and several member states reported about this impact). The social
impacts of GMO cultivation arise from the impact on businesses of contamination which could in some circumstances threaten the viability of enterprises and lead to job losses.

### 3. Inaccurate summaries of contributions of the member states:

The report failed to summarise adequately the diverse contributions of the member states. For example, several of the responses to the questionnaire refer to the unwillingness of insurance companies to cover damages caused by GM crops. Other member states say they are expecting increasing conflicts between farmers and other economic operators in rural areas. They raise concerns about the increasing dependency of farmers on GM seeds.

Neither of these concerns were acknowledged in the report.

### 4. Lack of science-based backing of the reports’ findings:

A. The report wrongly claims that the cultivation of GM crops would have a positive benefit for farmers who cultivate them by increasing yields and reducing production costs, and to a minor degree for farmers who cultivate herbicide tolerant GM crops. "Bt maize yields would increase in regions infested with corn-borers," and, “Overall, HT technology reduces production cost but the premium price for HT seeds may result in small or no effects on economic gross margin for farmers”.

B. These statements cannot be backed by literature quoted in the report. The paper asserts an average increase in cultivation of insect-resistant Bt maize in several Spanish regions. However, in the footnote it is stated that there is just one province in the Aragon region where the increases are statistically significant.

C. The latest data from the official agriculture research institute in Aragon is ignored in the report. The data showed that the yields have nothing to do with genetic modification. The differences, if any, are not statistically significant. vii

D. Since around 2000, weeds have increasingly developed resistance to Monsanto’s Roundup herbicide (glyphosate) in the US and in South America. This concerning development is not mentioned in the report. There are now 21 weed species around the world viii which have evolved to be resistant to the weed killer and weed scientists link this rapid increase to the use of Round-up Ready crops: “Most of the documented cases of evolved GR (glyphosate resistant) weeds in the past 6 years have been in GR crops”. ix

### 5. Missed opportunity of a political framing

In 2008 the Council of Environment Ministers reaffirmed that the current legal framework allows the consideration of socio-economic aspects in the authorisation system and reminded the European Commission of the need of a member states based assessment of the socio-economic impact of the cultivation GM crops. x

In their answers to the questionnaire several member states referred to the Norwegian approach and the Norwegian assessment of the long-term impacts on society, the environment and the food sector. xi

In reality more than 10 years of cultivation of genetically modified crops in North America and some years in South America has demonstrated major negative impacts on the environment, increasing conflicts in rural communities, and a long list of new problems for the whole food sector. In Europe, at present the socio-economic impacts of the cultivation of GMOs are limited because lack of demand means that in 2010 less than 0.08% of the EU’s arable land was cultivated with GM crops. Faced with several GM crops pending authorisation, this is a vital time for European decision takers to assess the broader impacts of opening European fields to these crops.
Friends of the Earth Europe believes that the following are necessary:

A. **The socio-economic impact assessment of GMOs must be integrated into the EU approval system**

Article 7 and 19 of the GM regulation 1829/2003 must be extended into a full socio-economic assessment. The Norwegian approach, by which applicants are obliged to present emergency response plans with methods to control unexpected spread of GMOs, is a good workable model.iii These costs and measures must be assessed for all crops before they receive market approval in the EU.

B. **Strict and compulsory anti-contamination measures in all European countries**

All costs to prevent contamination must be covered by the polluters. This must include complete segregation along the food chain to prevent contamination (breeding, production, transport, storage, drying, processing). If investments to secure non-GM production are necessary, then their cost must be covered by those who place GM crops on the market.

C. **Guaranteed liability of polluters**

Farmers, consumers and taxpayers need guarantees that companies bringing GM crops to the market will be strictly liable for any harm they cause. The polluter pays principle must be upheld so that compensation is available for contamination incidents and that those who contaminate food and feed with GMOs are held responsible for their actions.

We hope you will that upon further consideration you will also acknowledge the fundamental weaknesses in this report and consider ways of addressing its deficiencies. We would welcome the opportunity to discuss this matter with you further on a meeting at your earliest convenience.

Yours sincerely

Magda Stoczkiewicz
Director of Friends of the Earth Europe