

Submission on GM coexistence and liability to the European Parliament Agriculture Committee meeting on GM coexistence liability, 11th September, 2003.

The Munlochy GM Vigil represents 6500 consumers on the issue of GM crops and food.

As such we request that you take their concerns on board when you discuss the feasibility of coexistence between GM crops and other forms of agriculture.

Firstly, if GM crops are to be grown in Europe, existing forms of agriculture must remain unaffected. It is clear therefore that any coexistence regime must initially at least, be ultra precautionary. It may be possible to relax the regime in future after practical experience, but it will not be possible to "decontaminate" conventional and organic crops, food and seeds (inc seeds remaining in the soil).

To this end we request that the Committee calls for threshold levels of seed purity to be set at the minimum possible level, ie 0.1% as is in operation in Austria.

For gene flow, it may be necessary to totally restrict the growing of crops that have been designated as "high risk for crop to crop" contamination by the European Environment Agency, such as oilseed rape and maize.

For any other crops, strictly enforced and more than adequate separation distances must be written into law, that will guarantee, not only the present labelling thresholds of 0.9% (and 0% for organic), but also the possibility of reducing the former in line with improving testing procedures as demanded by consumers, retailers and as envisaged in the legislation.

Coexistence has to be backed by liability, and GM crops should not be grown commercially in the EU, until adequate measures on both issues are in place at an EU level. A single market necessitates EU legislation on these issues.

If novel products are to be forced onto the market against the wishes of consumers it is incumbent on those pushing and using the products to bear the costs of liability and identity preservation.

For organic farming, we must strongly insist (although we are not pro-organic in any way), that the present requirement for the total prohibition of GMOs in organic produce remains and is reinforced. This is what consumers demand, and guarantees that should they choose or need, the public can avoid the consumption of GM food.

As you will be aware, food is a vitally important issue, and to this end it is necessary that you take on board and protect the interests of those that you represent, the general public of Europe.