

Munlochy GM Vigil;

RESPONSE TO ACRE REPORT;

“MANAGING THE FOOTPRINT OF AGRICULTURE”

8<sup>th</sup> June 2006.

Dear members of ACRE,

Please find below a series of points in response to your report of 17<sup>th</sup> March;

This report could either be seen as another attempt to weedle GM crops into UK agriculture, or a genuine attempt to increase the sustainability of the UK agricultural system, and to repair the major damage incurred to the environment over the last half century.

We are continually disturbed by your knee jerk rejection of anything ever proposed by JNCC. Sometimes it almost seems personal?

You may indeed be trying to “change the offside rule”, but often it seems that you are simply moving the goalposts, to suit your failed frontline.

It is a substantial omission that you do not tackle liability in this report. Liability is a necessary component to incentivise precaution, and provide compensation, not only for economic losses, but also environmental damage.

Sometimes it is argued that liability may deter socially beneficial activities, and/ or stifle innovation. However this is economic fallacy. Any economic activity that cannot sustain the full costs that

it imposes on society (including environmental damage), and including the risk of that damage and hence costs, will have a negative overall impact. A social disbenefit.

The polluter pays principle is much talked about, but the present proposed EU Environmental Liability Directive, needs to be substantially toughened up by the UK Government, and the false economic arguments used against environmental liability need to be laid to rest. Society should not subsidise economic activities that externalise the costs associated with their damage to the environment. This includes agriculture, and this principle will not only protect and enhance our environment, but also lead to a more effective allocation of resources, and hence increased economic growth.

The “footprint of UK agriculture” cannot be managed effectively without it.

Mitigation and “compensation” are limited concepts, that are easily manipulated, difficult to police, and fall well short of the major changes that are necessary. If they are to be used at all, they should be used to mitigate against present harm (not used to justify future increases), and they should be a temporary step on the way to more fundamental change.

Any comparisons of various agricultural techniques, should not simply be set against present “worst case scenarios”, but instead examples of best practice.

We need to look very carefully before pushing the biofuels bandwagon too far. We need to be feeding people not cars, and we need to watch what signals we are sending to other parts of the world. We also need to look at social and economic implications of new technologies, and present systems; including market power, and issues around patenting.

Another huge omission from this report is the issue of waste. If we really want to reduce CO2 emissions from food and farming, and contribute more food to the global supply, we should be eradicating the waste in our food system. Nearly a third of all food produced in the UK is wasted! This fundamentally effects CO2 emissions, damages the environment, and the economic viability of UK farming, and is quite simply gross relative to the 850 million people globally who are malnourished.

Wastage on this scale will also be prevalent across the EU, and the USA, and is the kind of fundamental issue that needs to be addressed, as opposed to constantly tinkering with the symptoms.

We feel that this whole project should now be taken up by a more appropriate committee, that will actually look at all the issues involved, including those that don't actually make money for multinational corporations, or scientists with patents. This committee must have the respect of all elements of the food chain, and the general public. It also must include a much broader range of expertise, views and experience.

Recognising that a "core policy question is 'What does society want from the countryside?'" , one of the first tasks of this new committee should be to actually ask society, and initiate a wide ranging and inclusive debate, involving large numbers of the general public, and followed through as a priority. Vested interests are the greatest blockage in the way of sustainable land use, agriculture and food systems.

Thank you for your time..

Yours sincerely,

Anthony Jackson

(on behalf of Munlochy GM Vigil)

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