

## **The Organic Research Centre**

### **Developing Organic Principles & Best Practice**

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Department for Environment, Food and Rural Affairs GM Policy Team Zone 4/E5 Ashdown House 123 Victoria Street London SW1E 6DE

16<sup>th</sup> October 2006.

Dear Sir/Madam

### DEFRA CONSULTATION ON PROPOSALS FOR MANAGING THE COEXISTENCE OF GM, CONVENTIONAL AND ORGANIC CROPS THE ORGANIC RESEARCH CENTRES RESPONSE.

### 1. INTRODUCTION.

- 1.1. We at Elm Farm Organic Research Centre welcome the long awaited consultation and will address the specific issues/questions set out in the consultation document. However we have overarching comments which we do not believe are addressed amongst the plethora of questions asked.
- 1.2. Although we welcome any attempt to reduce red tape and for a "light touch" to be used by government we believe that using these as a driver for any coexistence regime is misguided and cavalier. With so much unknown about the consequences of growing GM crops in the UK a more precautionary and managed approach to their production is the most appropriate way forward. Particularly as many of the aims of GM production (ie pesticide reduction) can be achieved by alternative, more proven methods, which suggests a move to GM commercialisation is not needed.
- 1.3. The consultation says that it specifically addresses those crops likely to be first commercialised in the UK (oil seed rape, maize, sugar beet and maize) and we believe that the approach suggested is too light for these crops. We have additional and greater concerns of such a light touch being rolled out for all GM crops. The recently reported incidences in the USA of contamination of rice and *Agrostis stolonifera* demonstrates the risks we are dealing with and highlights the importance of a comprehensive coexistence regime whatever the crop.
- 1.4. We accept that the interest of farmers is at the heart of the document and that a co-operative rather than an adversarial approach is the best way forward. This assumes that there is give and take on both sides and the document does not reflect much give from the GM industry.
- 1.5. Paragraph 28 is the hub of our problems with the coexistence consultation document. The interpretation and application of the meaning of the word "adventitious" within the context of the consultation is disingenuous. Our understanding of adventitious and the Oxford English Dictionary definition is "accidental".
- 1.6. We believe the target should be zero. Why is it unrealistic to strive for zero contamination? There are methods of avoiding detectable levels of GM presence so any level can no longer be described as adventitious. We believe that a threshold of 0.9% for truly adventitious presence should be set for labelling purposes. However, this is not a target that should be worked towards but threshold that is rarely approached.

#### Director: Lawrence Woodward OBE

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1.7. Paragraph 30 explains how the normal operation of the market will decide whether GM crops are successful or not. The British Retail Consortium in August 2006 stated that the UK consumer was still rejecting GM products. However, in some cases it is likely we will arrive at a position where the consumer has no choice. There is information from Brazil that once the level of GM soya cultivation exceeds 20% segregation of GM and non-GM will be uneconomic resulting in a solely GM production line. Where does this allow the consumer choice? There is also considerable pressure being put on Brazilian ports, who are addressing consumer choice in attempting to maintain a segregated GM free port, to handle GM soya. This is clearly an area where the market is not being allowed to prevail and we have concerns that this example could be replicated over a range of commodities ensuring that the interests of GM companies and not the consumer win out.

### 2. DO STAKEHOLDERS HAVE ANY COMMENTS ON THE PROPOSED SCOPE OF THE COEXISTENCE REGIME?

- 2.1. We do not accept the scope of the coexistence regime. We believe that a tighter regime is needed. We have the following specific comments.
  - 2.1.1. We believe that non-GM production should aim for a non-detectable level of contamination and procedures and processes put in place to assist this. However, labelling level of 0.9% for truly adventitious presence is required to protect producers.
  - 2.1.2. This raises the issue of accepting the proposed seed contamination levels. Accepting these levels of between 0.3 and 0.5% would result in an extremely limited margin for error to meet a 0.9% final level in product. The seed levels must be set as undetectable to allow product to leave a farm gate with as low as feasibly possible GM presence.
  - 2.1.3. The coexistence regime presented chooses to disregard any part of the food chain after the farm gate. In addition it works to a GM level of near to 0.9% at the farm gate. This allows no margin for any additional presence once the product has left the farm gate. In the first years of GM production this may be a reasonable assumption to make as dilution with non-GM product could occur. However, if GM production was to increase then the availability of non-GM to dilute contaminated product will be rapidly reduced making it increasingly difficult to maintain 0.9% or less in end product.
  - 2.1.4. The proposed regime excludes contamination of crops grown for own use ie fodder maize or crops on allotments or domestic gardens. This is not acceptable. These consumers and their crops should enjoy the same protection as all others. Many allotment and back garden growers produce their own food for the reason that they know what has been done to it and what is in it. This proposed coexistence regime removes this opportunity from them.
  - 2.1.5. This proposed regime (or whatever regime is adopted) must not be seen as a template that other crops would just be dropped into. A full risk assessment must be undertaken on all other GM crops that are brought to the market in the UK.

### 3. POTENTIAL SOURCES OF GM CONTAMINATION.

### **3.1.** Do stakeholders accept the above analysis of the potential sources of GM presence and the assumptions that Defra is proposing should underpin the coexistence regime?

- 3.1.1. We accept that the potential sources of GM presence appear to have been covered but question many of the assumptions.
- 3.1.2. We do not accept the issue that because beet is biennial that it is easily controlled. There is no reference or mention of the real likelihood of beet cross pollinating with native species, hybridising and creating a reservoir of GM in the environment. How will this be addressed in any coexistence regime?
- 3.1.3. Cross pollination between sexually compatible plants is dismissed by saying it happens mainly at close range so relatively small separation distances are acceptable. Why should we accept any more contamination than seed stocks which will require longer distances? The levels being set look suspiciously like ones that can be achieved to maintain a final GM presence level of below 0.9%.

- 3.1.4. Border or barrier rows are mentioned throughout the document with repeated caveats that there is no proof that they will work or how well. This method should be removed from the document until further work has been undertaken, refereed and published. Paragraph 44 introduces barriers again in the context of when separation distances are difficult to observe. If they separation distances are difficult to observe then GM crop should not be grown in that location.
- 3.1.5. Paragraph 45 says it is "desirable" for beet farmers to minimise cross pollination from bolters. This is a weak and weasely word it has to be replaced with "essential".
- 3.1.6. The likely transfer of seed by machinery is down played in the consultation document. It says that it is disproportionate to expect a complete clean down between farms and only have to clean those parts of machinery that are readily accessible. This is not acceptable. It may be acceptable for a farmer to accept the risk of these machines moving within their farms. However, it is not acceptable for machinery that is moving between farms and likely to contaminate road ways and other farms once it has left the GM farm.
- 3.1.7. Tables 1 and 2 give us great concern and demonstrate the precariousness of the proposed regime. They can only be taken seriously if we assume that we will always be dealing with very limited background levels of GM, either through remaining volunteers or native GM hybrids. In the case of oil seed rape and beet this is not a safe assumption to make. This makes the calculation of a 0.81% level in oil seed rape dangerously close to the 0.9% level (without any additional off farm contamination). This highlights the need to reject seed levels at levels of 0.3-0.5%.

### 4. PROPOSED COEXISTENCE MEASURES.

#### 4.1. Do stakeholders accept Defra's proposed overall basis for the coexistence regime as outlined above?

- 4.1.1. We do not accept the proposal for what will be statutory and what is a voluntary. All areas of the coexistence regime are essential and must be statutory. The description of such things as controlling volunteers as desirable is insincere. A statutory requirement to adhere to an agreed best practice must be instituted.
- 4.1.2. Defra appears to be overly worried about a disproportionate burden on GM farmers. We question the disproportionate burden on non-GM farmers. The proposed GM crops are new with proven additional impacts on other farmers both economically and environmentally. There has to be a greater burden on GM farmers rather than accepting that other farmers (who will not gain from the purported benefits of going GM) must shoulder an unreasonable share of this burden. Organic farmers burden all of the additional regulation and legislative burdens; would it not be appropriate for GM farmers to do the same?
- 4.1.3. A voluntary code of practice is too weak, will be toothless and is failing to address the concerns of the UK consumer. We do not accept that controlling volunteers and bolters is difficult to specify unambiguous in law and difficult to enforce. This would only be so if the regime as it is currently proposed allows uncontrolled production with no requirement to keep records of what has been grown and when. A statutory requirement to adhere to an agreed best practice must be instituted.

# **4.2.** Do stakeholders have particular comments on the analysis in the draft Regulatory Impact Assessment (at Annex B), and on what it says about Defra's plans to enforce, monitor and review the coexistence regime?

- 4.2.1. Many of our comments on the RIA are covered elsewhere in this document. There are a number of specific points.
- 4.2.2. Paragraph 9 suggests that applying the costs of coexistence to GM farmers is a tax on innovation. To use such an emotive word in reference to a regulation is not acceptable. There are plenty of production regimes where the farmer/grower has to pay to be included or certified (organic and various assured produce schemes come to mind). There is also a widely accepted policy of polluter pays that can be applied here. Paragraph 9 should be removed from the RIA.
- 4.2.3. The options are unbalanced and biased. A GM free England option should be explored.

4.2.4. The tone of the whole RIA is such that is suggests that Defra is apologetic and against any form of regulation in this area. This is not acceptable and goes against the wishes of consumers who have in the past and continue to reject GM food.

#### 5. STATUTORY SEPARATION DISTANCES.

- 5.1. Do stakeholders agree with these proposed distances? If not, which aspect(s) of the supporting analysis and proposed assumptions made by Defra are thought to need further consideration? What do stakeholders think of Defra's proposal not to differentiate separation distances by GM Index or field depth?
  - 5.1.1. The choice of separation distances is arbitrary and appears to have been chosen to address a final GM presence of 0.9% as a target and not a threshold. We would want to see lower GM presence levels. The aim of the regime should be to maintain the lowest possible levels of GM presence and only in genuine circumstances should adventitious presence be found.
  - 5.1.2. Paragraph 80 seems to be set out to confuse. Table 4 which it accompanies is in hectares while paragraph 80 refers to field depths. These are clearly separate things as surely a modelled hectare approach assumes a regular (square/circular) field while depth does not. What are the implications of this as there is evidence in the literature that area and distance have different impacts on pollen flow (REF).
  - 5.1.3. The recommendation for a separation distance for oil seed rape of 35m is not acceptable as a this would allow for a contamination level of 0.3% which is too high (as it would account for a third of the 0.9% labelling level). A separation distance should be set to aim for lowest detectable level assuming this is not too onerous on the GM farmer. A level of 0.1% (or lowest detectable level) is easily manageable through a small increase in the separation distance of 20m and this is what should be aimed for. Therefore based on Defra's own evidence a separation distance of 55m for winter and spring oil seed rape is manageable, reasonable and essential to protect non-GM farmers.
  - 5.1.4. From the NIAB report a distance of 110m for grain maize would give a GM presence level at the lowest detectable level. For fodder maize the distances are slightly reduced with a distance of 90m giving a lowest detectable level. Due to the likelihood of confusion between crops a single separation distance should be set for maize of 110m, which is the level suggested for grain maize in the consultation.
  - 5.1.5. To reduce red tape and the chances of any confusion. There needs to be a single distance for each crop.
  - 5.1.6. Paragraph 82 covers the issue of cross pollination from just one source and that the possibility of pollination from more than one source will be in the review. It is not acceptable to allow GM production without this issue being addressed within the coexistence regime. The likelihood of a non-GM farmer being bordered by more than one GM farmer has to be taken seriously and addressed.

### **5.2.** Do stakeholders accept how the proposed separation distance requirement would apply? What do stakeholders think of the idea at paragraph 87 that some local discretion might be allowed?

5.2.1. Paragraph 87 suggests that two farmers can agree on other measures than crop separation distances. This is of great concern. How will this be managed and documented. What if it goes wrong? It appears to be a recipe for conflict and a rush towards reducing red tape to allow easier introduction of GM without thinking through the issue.

### 6. STATUTORY NOTIFICATION AND LIAISON REQUIREMENT.

- 6.1. Do stakeholders have any comments on how the proposed notification and liaison requirement would operate? What do stakeholders think about having a single notification deadline for spring-sown crops, rather than separate deadlines for spring rape and maize respectively (paragraphs 91/92)?
  - 6.1.1. A Statutory notification requirement is essential.
  - 6.1.2. The dates for of  $1^{st}$  March and  $1^{st}$  August are probably workable with the crops in the consultation.

- 6.1.3. The fourteen calendar days notification period is clearly not sufficient time. It assumes that you can talk over the farm gate with any neighbour. It does not allow for the farmer to be away form the farm for this period. There are also issues to do with either the GM or non-GM farmer using early or late notification as way of manipulating the situation as the consultee may not have plans in place when approached. How will this be dealt with?
- 6.1.4. A none response to a notification being accepted as a positive response is not acceptable. It is clearly open to abuse. How would you prove that the notification was sent, received, returned? There are a whole host of both accidental (lost in mail) and underhand (do not send the notification) ways that this proposed approach could cause problems. There must be a statutory requirement to respond to any notification and a clear and transparent paper chain to demonstrate that the process has been undertaken and adhered to.
- 6.1.5. To set notification distances as the same as separation distances is not acceptable. The separation distances have been set on the basis of the modelled flow of pollen. We know that there will be pollen flow that does not fit this model (due to whether conditions, topography etc). Therefore notification distances must be set at much greater distances to allow those producers who wish to grow GM-free produce to adjust their cropping plans. We also believe GM farmers should be obliged to take the wishes of these farmers into account when setting there cropping plans.
- 6.1.6. This also highlights the need for a register and a tougher compensation package. It is imperative that where contamination occurs outside of the notification distance that it is identifiable where the source of the contamination has come from and that the contaminated grower is recompensed.

#### 7. OTHER COEXISTENCE ISSUES.

#### 7.1. Do stakeholders think this is a reasonable way forward on farm-saved seed?

7.1.1. We accept that the proposed situation appears sensible.

#### 7.2. Do stakeholders agree that a formal training requirement is unnecessary?

- 7.2.1. We accept that farmers do not need specific training as long as any GM farmer is fully liable for any damage caused through their lack of knowledge.
- 7.2.2. This is an example where Defra appears to be overly worried about a disproportionate burden on GM farmers.

#### 7.3. Do stakeholders accept this conclusion on honey production?

7.3.1. The situation for honey producers is unacceptable. Any presence in their product would undermine the authenticity of the product.

### 8. COEXISTENCE BETWEEN GM AND ORGANIC PRODUCTION - POSSIBLE SPECIAL ARRANGEMENTS.

# 8.1. Should responsibility for any threshold below 0.9% rest with GM or organic growers? How would organic producers cope with a threshold lower than 0.9% if the onus for meeting it rested with them? Are there important points that are not covered in the arguments outlined above?

- 8.1.1. Government have clearly reneged on promises by previous ministers. Jeff Rooker, Minister of State, Ministry of Agriculture, Fisheries and Food in July 1998 said "...our desire is to ensure that the introduction of GMOs on a trial basis, an experimental basis, or even a full-crop basis, in no way damages organic farming" and "...it would be stupid for the Government to push more money into converting to organic farming while allowing the farmers who take that brave step to be damaged by other actions...". Ian Pearson MP, Defra Minister of State for Climate Change and Environment, speaking as recently as June 2006 said "We are supporting the expansion of organic farming and want to ensure that the possible introduction of GM crops does not unreasonably prejudice the organic sector." The spirit if not the word of what has been previously said has been ignored and turned on its face.
- 8.1.2. Notions of setting differential target values for organic verses non-organic conventional production are at first glance attractive and appear to represent scope for the development of enhanced

8.1.3. The guiding principle must be for organic farmers to work towards an undetectable level of presence within their systems and end product. This is particularly important in sourcing seed and feed for example where the current organic regulations prohibit the knowing introduction of GM product into an organic system.

the issue has so far focussed on a level of zero.

- 8.1.4. Organic farmers should work towards an undetectable level of presence within their systems and end product but an adventitious level of 0.9% must be allowed as a precautionary level for truly adventitious presence. The impact of seed thresholds is critical here for organic farmers to aim at a non-detectable level.
- 8.1.5. The co-existence issues raised in the document for proposed GM crops (maize, OSR, sugar beet and potatoes) are academic. We agree that currently these crops are either of limited importance to organic producers (OSR, sugar beet although fodder beet may be a different issue) or there are minimal co-existence/contamination issues (maize, potatoes). This may not be the case for future GM crops brought to the market and it must be ensured that organic farmers can continue to grow and produce their products with a minimum level of contamination at no additional costs to them.
- 8.1.6. The issues of GM contamination of inputs are real and happening already in such inputs as animal feed. The EU, national competent authorities and organic certification bodies need to put their houses in order so that the threat to organic systems and markets from this contamination route is eliminated.
- 8.1.7. Paragraph 117 suggests that any additional separation or such activities should be borne by the organic farmer as they are gaining the benefit from the premium and it is what they do for other factors already. We believe this is a poor argument from government as they are changing the goal posts and expecting organic farmers to pick up the tab.

### **8.2.** What do stakeholders think of this analysis – is there any firm evidence that would call this into doubt or support a different conclusion? Is there an alternative analysis that should be considered?

8.2.1. We agree with this analysis.

# 8.3. What do stakeholders think about this? Is the expectation that demand from the organic sector will generate production of enough seed which is below EU labelling thresholds to enable a threshold for organic produce lower than 0.9% to be met? Will consumer demand for organic products distinguish between a GM threshold of 0.9% and, say, 0.5%?

- 8.3.1. We believe that all seed thresholds should be set at below detectable limit. It is highly unlikely that there will be enough demand for all organic seed with a threshold below 0.1% for all crops and varieties. In many cases there is currently insufficient organic seed available so it is highly unlikely that market forces will allow GM free organic seed in all cases. However, if a seed levels are set between 0.3 and 0.5% it will prevent organic farmers using these products as they will be knowingly introducing GM product into their system.
- 8.3.2. A single level needs to be set for organic produce. The analysis of possible lower organic contamination levels to 0.5% seems reasonable but would require an unreasonably large burden to be placed on the organic farming sector. It is more important that organic farmers aim for a level of beneath the lowest detectable level but with the threshold of 0.9% for truly adventitious presence.
- 8.3.3. It is also unlikely that the consumer will distinguish between a 0.5 and 0.9% threshold as much of the organic publicity on this issue has designated a zero level.

### **8.4.** Do stakeholders accept this analysis? Are there technical points that need to be clarified or points not covered above that should be considered?

8.4.1. The analysis of PCR and it reliability is of concern and undermines the confidence consumers and others could have in a 0.9% threshold.

#### 8.5. Is a process-based standard an alternative way forward? How practical is it?

- 8.5.1. A process approach must be used. Organic certification does not routinely measure for pesticides on its produce so why this should be done for GM. However, this does not stop customers doing so and expecting no detectable levels.
- 8.5.2. If an organic level was set at 0.1%/lowest detectable level and that organic farmers were required alone to undertake the measures to ensure that this threshold was not exceeded it would bankrupt organic producers. GM-free would be impossible in enough cases to make it meaningless.
- 8.5.3. We grudgingly agree with the consultation document in this section.
- 8.6. Overall, what do stakeholders think is the appropriate legal threshold for adventitious GM presence in organic products, bearing in mind the various factors considered above? With the general objective being to minimise GM presence as far as possible, but allowing for the practical constraints, what should be the specific aim in relation to organic production? Should the Government support the Commission's proposal to fix the threshold at 0.9% or argue for a lower figure?
  - 8.6.1. We support the 0.9% threshold for organic products. We believe that organic products should be GM-free but accept that this is increasingly difficult with the growing production and trade in GM products. The organic sector must do more to eliminate the contamination of its own system (from animal feeds etc). We must aim for zero but allow a truly adventitious level of 0.9%.

#### 9. REDRESS FOR ECONOMIC LOSSES.

### 9.1. Have we correctly identified the range of losses that might occur in crop values? What are your views on the proposed approach for dealing with the corn-on-the-cob scenario?

- 9.1.1. It is highly likely that in the timeframe of the first GM crop production to the review, after 2-3 years, non-GM produce that is contaminated with GM will be of lower value. Any losses must be compensated for as must any additional costs, including analytical tests.
- 9.1.2. All additional costs for the introduction and running of the regime must be borne by the GM industry. This should include all additional testing costs as well as compensation, monitoring etc as well as costs for Defra farm inspectors.
- 9.1.3. Paragraph 142 says that losses will be paid on a whole field basis. As it can take 2-3 days to tests for GM presence level how do farmers deal with crops from each field? Are farmers supposed to store each field separately? What if the product leaves the farm ahead of these test results? Payment for the loss of a whole crop from a farm may be needed?
- 9.1.4. Profit forgone if sold as GM is the minimum that should be provided.
- 9.1.5. The corn-on-the-cob scenario seems to be acceptable. However, it does not make it clear who pays for tests?
- 9.1.6. We believe that the document has identified a range of losses that would be expected but does not go far enough. The loss of "contract" such as from a supermarket due to the presence of GM is a direct cost of GM contamination.

# **9.2.** Should consequential or additional losses be covered by any redress mechanism? If so, which should be covered and why? How likely are these to occur? Are there any other types of loss that should be considered?

- 9.2.1. Any losses by the non-GM farmer must be covered ie additional storage, transport etc. This must also include the cost of sampling and testing.
- 9.2.2. We understand the concerned that if there are too many losses covered a compensation scheme will be too complicated. The scheme should be as complicated as it needs to be and not diluted under the cover of reducing red tape.

9.2.3. It is highly likely that contracts will be lost due any GM contamination. The document says that this is a function of the market or will be covered by contract law and will not be included in the compensation scheme. This is not acceptable and shows a worry lack of understanding in the UK food chain by Defra. It makes an assumption that there are binding contracts in place. This is not the case in many farmer/customer relationships. The competition commission could inform Defra of the precarious position supermarket suppliers are in.

### **9.3.** What should the eligibility requirements be for non-GM farmers to seek redress? Are there particular criteria that have not been highlighted?

- 9.3.1. As long as the non-GM farmer has met their requirements to the best of his abilities he must be eligible for redress.
- 9.3.2. The time that it takes to test and the mixing of product post-farm is an important issue. In many situations product from a range of farms may be mixed and only then a positive result identified and product rejected. In this case all farmers must be compensated.

### 9.4. Are there any alternative ways of distributing the burden on the GM sector? Are there any strong arguments or pros/cons to each approach that have not been covered?

9.4.1. The GM seed industry should pay for this scheme. It can be collected through a levy on GM seed sales.

### 9.5. Which redress mechanism do you favour and why? If a compulsory redress mechanism is your preferred option, which of the models at paragraph 166 should it employ?

- 9.5.1. Farmers should not have to resort to law to gain redress. A voluntary redress scheme is also unacceptable as through many other industries it has been shown that they are biased towards the industry and toothless in many cases. A statutory redress mechanism must be put in place.
- 9.5.2. A fund needs to be collected for redress directly from seed sales. How it is administrated should be the simplest and most cost effective method a mixture of 166a establishing a specific body with the power to require GM seed companies to pay redress directly to non-GM growers and 166c establishing a specific fund would be our preferred option.

#### 10. A PUBLIC REGISTER IF GM CROPS.

# **10.1.** How could a crop register aid coexistence? Are there other reasons to justify the establishment of a register? How should any register relate to a notification requirement? If a register is established should the information be available to everyone? How would a register be funded?

- 10.1.1. A register is a specific co-existence issue. The consultation assumes that coexistence is only an issue in the single year of planting. This is not the case and a record of what and where GM crops have been grown is essential not only to monitor the code of practice and coexistence regulations but also as a safeguard for any unforeseen problems in the future.
- 10.1.2. The consultation document assumes that coexistence will be an issue from a single crop to another. If there are additional GM crops also being grown (close by but outside the coexistence and notification distance) a farmer needs to know as it increases the likelihood of contamination of the crop.
- 10.1.3. A register could be used in conjunction with the notification requirement. Consent forms could be used to populate the register.
- 10.1.4. We understand the concerns about the destruction of crops. However, a public register can be made available in many different ways so that some form of protection can be established as it is for other sensitive but public information.
- 10.1.5. The total disregard for allotment growers and gardens in this section (179c) is both breathtaking and arrogant. These people have the right to know what is likely to be contaminating their crops. GM farmers with fields bordering or within designated separation distances of gardens/allotments must be required to notify these people. We do not understand the logic that if you grow it and consume it yourself you do not need to know what is in it?

10.1.6. Any costs of the register must be borne by the GM industry it is an issue created by them and public money must not be spend on it.

### 11. VOLUNTARY "GM-FREE" ZONES.

### **11.1.** Do stakeholders have particular comments on the guidance that Defra could make available on GM-free zones. Are there relevant points that have not been covered in the above?

11.1.1. This seems acceptable but pretty toothless as it has no status in law. A nice marketing ploy if it can be implemented but it will be limited by how joined up you can get you non-GM farmers.

Yours Sincerely

**Dr Bruce D Pearce** Deputy Research Director.