



To: the European Commission at: 'AGRI-H3@ec.europa.eu'; 'AGRI-ORGANIC-CONSULTATION@ec.europa.eu'

Subject: On line consultation for the review of the European policy on organic agriculture

26 April 2013

With this letter the Public Research and Regulation Initiative (PRRI) provides some further context to its replies to the questions of the above on-line consultation, because the consultation did not allow for providing a broader context and perspective.

PRRI is a world-wide initiative of public sector scientists active in modern biotechnology for the common good. One of PRRI's main aims is to bring more science to the international debate on biotechnology. More information about PRRI and its members can be found on www.ppri.net.

PRRI strongly supports earlier statements of the European Commission to the effect that in the interest of strengthening sustainable agriculture and food security in Europe, no form of agriculture should be excluded from the range of tools that is available to farmers. In this context, PRRI supports the assertion of the European Group on Ethics in Science and New Technologies (EGE) in their Opinion on the Ethics of modern developments in agriculture technologies (Opinion 24) that:

"In the field of new agricultural technologies, in addition to risk assessment, there is a need for impact assessment at national and European levels. Impact assessments examine the risks and benefits to human health and the environment of using a new technology and those of not using it, including the risks and benefits of retaining current technologies. They take account of the need to ensure sustainability, food and feed security and safety."

The challenges of feeding the world without destroying it are so immense that no single technology will be able to provide all solutions. The future of sustainable agriculture and food security is not a matter of 'either this or that technology', but rather combining different approaches so that they can strengthen each other, tailored to meet particular needs at local level of producer, consumer or processor groups.

The future of sustainable agriculture and food security also demands that governments and EU institutions conduct scientifically sound assessments of the extent to which the different approaches can contribute to strengthening sustainable agriculture and/or to food security. Such assessment should bear in mind that productivity is a key element of sustainability, that all approaches have their advantages and disadvantages, and that any approach can be applied wisely and unwisely.

With this background, PRRI makes the following general observations about the on-line consultation and about organic farming in relation to GMOs.

Consultation – lack of broader context.

PRRI is disappointed that the consultation does not start with providing the above broader context, but instead seems to confirm the unsubstantiated notion that organic farming in itself is eco-friendly



and provides high-quality products. There is no scientific evidence to support either assumption.

As various studies of public research institutes have underlined¹: whether or not certain organic approaches are overall sustainable and/or result in high quality products depends on many factors, including management. Some organic practices can be beneficial, while other approaches can have detrimental effects. A tragic example of the latter are the many deaths in 2011 in Germany after consumption of organically produced bean sprouts due to an outbreak of a highly virulent E. coli strain causing over 50 deaths and thousands of survivors with malfunctioning kidneys.

Organic farming in relation to GMOs.

In an early years of the use of GM crops in agriculture, many people in the organic farming community adopted the notion that GMOs are in themselves incompatible with the concept of organic production. This notion too, is unfounded.

It is first of all important to remember that organic is a way of farming while genetic modification is not a way of farming but a tool in breeding, as are cell fusion and radiation induced mutation - the resulting seeds of which are used widely in organic farming.

The notion that GMOs are in themselves incompatible with the concept of organic production is an assumption for which there is no evidence. In fact, it has been documented for many years that on the molecular level there is no difference between breeding methods based on mutation alone and those that use single genes, since they all rely on the same basic processes of deletion, insertion and nucleotide substitution.

A growing number of expert articles address the potential of incorporating GM in organic farming.

To give just some examples of a long list of articles:

- Ronald, P. C. and R. W. Adamchak (2008), *Tomorrow's Table: Organic Farming, Genetics, and the Future of Food* edn. Oxford University Press, USA (April 18, 2008) IS: ISBN-10: 0195301757 ISBN-13: 978-0195301755 pp. 232.
- Ammann, K. and M. van Montagu (2009), *Organotransgenesis arrives*. *New Biotechnology*, 25, 6, pp. 377-377, <http://www.sciencedirect.com/science/article/B8JG4-4W7YY1F-1/2/28740dfca05cf12bb3b973b4f4568ccb>.
- DeRenobales-Scheifler, M. (2009), *More sustainable food: Genetically modified seeds in organic farming* edn. Junta General del Principado de Asturias Sociedad Internacional de Bioética (SIBI), IS: pp. 119, <http://www.sibi.org/ingles/jgp/p2009.htm> English, and <http://www.sibi.org/jgp/p2009.htm> Spanish

¹ see for example the Report "Comparison of composition (nutrients and other substances) of organically and conventionally produced foodstuffs: a systematic review of the available literature " for the Food Standards Agency by the Nutrition and Public Health Intervention Research Unit London School of Hygiene & Tropical Medicine.



If you wish to receive more articles about this topic with detailed scientific and socio-economic argumentation, please contact em. Prof. Klaus Amman, klaus.ammann@ips.unibe.ch.

Finally, PRRI proposes to organise, if possible in collaboration with the Commission, a meeting to explore the reasons for and impacts of excluding GMOs from organic farming.

This letter will be placed on the PRRI website.

Yours sincerely,

A handwritten signature in black ink, which appears to read 'Montagu', is positioned below the text 'Yours sincerely,'.

Em. Prof. Marc Van Montagu ,

Chairman of the Public Research and Regulation Initiative (PRRI)