



**Friends of  
the Earth**



# Say NO to GM contamination

How to respond to the GM contamination  
consultation in England – step by step



[www.stopgmcontamination.org](http://www.stopgmcontamination.org)

**DEADLINE: 20 October 2006**

*“With the exception of climate change, genetically modified crops are the most serious political and environmental question under debate at the current time.”*

Michael Meacher MP, Former Environment Minister

Please note – this guide is specifically for use in England. Separate consultations are being launched in Wales, Scotland and Northern Ireland. For details of how to respond to those, please see [www.stopgmcontamination.org](http://www.stopgmcontamination.org) or call Friends of the Earth on 020 7490 1555.

## Introduction

*"If conventional and organic crops can become contaminated by GM crops grown nearby, those people who wish to be sure they are eating or growing absolutely natural, non-industrialised, real food, will be denied that choice. This seems to me to be wrong."*

Prince Charles, Daily Mail, 1999

The Government's 'coexistence' consultation has been launched to get views on what practical measures are needed to control GM contamination, if and when GM crops are grown. The outcome is crucial – it will decide whether GM contamination is allowed to become a routine part of farming, or whether it will be prevented, allowing sustainable farming systems to develop to their full potential. And it will decide who will be held liable when contamination occurs. Anyone with an interest in farming, the integrity of our food, the environment, health and the protection of the purity of seeds should be involved.

'Coexistence' is European Commission language, used to describe their vision of the harmonious growing of GM crops alongside conventional and organic crops across the EU. On 20th July they issued a consultation about their proposals for England – similar consultations will be issued for Scotland, Wales and Northern Ireland later. To achieve 'coexistence', the Government is planning to allow conventional, and even possibly organic, crops to become routinely contaminated.

Below we outline the information and arguments you need to produce a highly effective response to these plans for GM contamination. **You don't have to be an expert on GM to respond, you just need to care about the future of food and farming.** You may not have much time, but you can still have your say. We have a right to be heard on this crucial issue, but we only have three months to make our views known. This guide explains how to have your say, step by step.

**Part I** outlines the background to the consultation

**Part II** explains the 'ten major flaws' in the Government's proposals and how to put together your response

The deadline for responses is Friday 20 October 2006

## Part I – Background

What kind of food and farming system do we want to see?

*“The policy of drawing of funds away from low-cost sustainable agriculture research, towards hi-tech, exclusive, expensive and unsafe technology is itself ethically questionable. There is a strong moral argument that the funding of GM technology in agriculture is harming the long-term sustainability of agriculture in the developing world.”*

Tewolde Berhan Gebre Egziabher of the Institute of Sustainable Development in Addis Ababa, Ethiopia

Friends of the Earth and GM Freeze would like to see a future where consumers can trust what they eat, where the environment is protected and wildlife thrives, where food is eaten near to where it is grown, where farmers can make a living from their land, and where healthy food is available for all.

Instead of funding fruitless GM research, we want to see public money being used to fund research which targets the real problems in agriculture in the UK, Europe and worldwide, investigating the most sustainable solutions which benefit the environment, farmers and consumers.

Solutions are likely to involve a shift away from intensive monoculture farming, and an increase in diversity and mixed farming. Support will be needed for organic and other less intensive systems, and regional and local food networks will be essential in providing both environmental benefits and strengthening local economies, bringing power back to local level and away from the biotech and agrochemical companies.

What’s wrong with GM crops?

*“Agriculture has been a 10,000-year process and many changes have taken place over decades or centuries. GM has gone from development to application in just 10 years and that's not enough time to understand its effects.”*

Tim Lang, Professor of Food Policy, City University

Despite 30 years of research and public money and ten years of commercialisation, the industry has delivered just two GM traits: herbicide tolerance and insect resistance. Evidence from around the world shows a host of negative effects on the environment from growing GM crops, such as impacts on biodiversity and increased volumes of herbicides being used. Whilst the long term health implications of GM crops remain to be fully investigated, worrying research is emerging about potential impacts, for example the creation of new allergens<sup>1</sup> and unintended changes to plant DNA<sup>2</sup>

The vast majority of the four main GM crops (soya, maize, oilseed rape and cotton) are grown in just four countries (the US, Argentina, Canada and China). Most GM

<sup>1</sup> <http://www.pi.csiro.au/GMpeas/GMpeas.htm>

<sup>2</sup> Latham J, Wilson A, and Steinbrecher R (2006) The Mutational Consequences Of Plant Transformation, *Journal of Biomedicine and Biotechnology* Volume 2006:1-7

crops are destined for animal feed, fuelling intensive farming systems in the west, and none have been introduced to address hunger and poverty issues. GM crops in developing countries have been grown mainly as cash crops for export, sometimes at the expense of local food production.

Many practical problems have also come to light after GM crops have contaminated neighbouring fields, from Monsanto suing farmers for breaching its patent rights to farmers losing their organic status.

GM crops were introduced to increase corporate control of the global seed supply, not to deliver benefits to consumers or the environment. With herbicide resistant crops, biotech companies produce both the GM crop and the associated weedkiller, doubling their profits. Thirty years of research is invested in this technology, so despite its failings the biotech companies, and some governments, are determined to find a use for it.

Most GM legislation in Europe has so far been decided in Brussels. But for 'coexistence', the European Commission decided to leave this tricky problem to member states. This consultation gives us a rare UK-based opportunity to stop the biotech companies gaining a foothold here. The timing is crucial – the biotech industry is currently attacking on all fronts – claiming victory in the WTO GM trade dispute with the USA, lobbying for a lifting of the global ban on 'Terminator technology' that produces sterile seeds, and keeping the pressure on the European Commission to approve every GM application they process, despite wide ranging concerns of member states over their safety.

Over the last two years the Government has buried GM as a political issue in the UK, along with its unpopular views. This consultation puts the spotlight back on Government plans to back the biotech industry over the wishes of the public. It is crucial that people who care about protecting our food, farming and environment from GM contamination get involved and respond to the consultation.

### What we have achieved to date – 5 big wins

1. There have been no new GM crops approved for cultivation in the EU since 1998. Only Spain has grown GM maize in any significant quantity.
2. In 1998, the UK Government was about to add the first GM maize seed to the national seed list, allowing it to be commercially grown. Six years later, after a long running Friends of the Earth campaign which revealed serious safety concerns and a flawed approval process, biotech company Bayer withdrew the maize saying it was "*economically unviable*".
3. No GM crops have ever been grown commercially in the UK.
4. Consumer resistance has ensured that supermarkets remain firm in their non-GM food policies
5. Over 18 million people in the UK and 163 million people across Europe now live in areas wishing to be GM-free.

## Part II – Making your response

This section explains how to put together your response to the consultation, no matter how much, or how little, time or GM expertise you have.

### Step 1. Write your response

- If you don't have much time, use our 'nutshell' letter as the basis for your response and edit it into your own words.
- To have more impact, use the points under our 'ten major flaws' section as a guide for putting together your response. Don't feel you have to use all the information under each point, just use the parts that most resonate for you. In fact it is better if all responses look different.
- If you want to add more detail, use the 'back up your case' points which reference further information to strengthen each point, and add any further information you may have, or points you want to make.

Full copies of the consultation papers, if you wish to read them, are available at [www.defra.gov.uk/corporate/consult/gmnongm-coexist/index.htm](http://www.defra.gov.uk/corporate/consult/gmnongm-coexist/index.htm) or by calling the Department for Environment, Food and Rural Affairs (Defra) Helpline on 08459 33 55 77

### Step 2. Personalise it

The responses will have much more of an impact if they are different and personalised. Think about including any specific personal or local concerns, eg if you have lots of organic farms in your area, if food production is important to your local economy, or if you have important farmland wildlife that could be affected if GM crops are grown.

### Step 3. Make it look like a consultation response

Actually, there's not much to it. Your response does not have to have a particular structure, just specify that you are responding to the "*Consultation on proposals for managing the coexistence of GM, conventional and organic crops*" and state whether you are responding as an individual or on behalf of an organisation.

### Step 4. Confidentiality and transparency

Your response will be available to the public on request through the Defra library. For further information about confidentiality, see paragraph 14 of the consultation document, and state if you wish your response to remain confidential.

### Step 5. Send it off before 20 October 2006

Send your response to Defra – email [GMcoexistence@defra.gsi.gov.uk](mailto:GMcoexistence@defra.gsi.gov.uk) or post to Department for Environment, Food and Rural Affairs, GM Policy Team, Zone 4/E5, Ashdown House, 123 Victoria Street, London SW1E 6DE

### Step 6. Send us a copy

It is useful for us to know how many people have taken action. Send your response to [richh@foe.co.uk](mailto:richh@foe.co.uk) or post to Richard Hines, Friends of the Earth, 74 Kirkgate, Leeds LS2 7DJ.

## Step 7. Congratulate yourself

You've just done something very important to make your views known to the Government and help stop their GM contamination plans.

## Step 8. What else can you do?

- Join our dedicated email list to stay informed about the campaign, including a possible event in London to mark the end of the consultation on 20 October. Go to [www.foe.co.uk/campaigns/real\\_food/press\\_for\\_change/join\\_gm\\_list/](http://www.foe.co.uk/campaigns/real_food/press_for_change/join_gm_list/) to sign up. If you do not have email access, contact Richard Hines with your preferred contact details on 0113 2428153.
- Send a copy of your response to your MP (see [www.locata.co.uk/commons/](http://www.locata.co.uk/commons/) or call the House of Commons Information Office on 020 7219 4272 to get their contact details). Also ask them to sign Early Day Motion 396 to show their support, and to write to Environment Secretary David Miliband about your concerns.
- Visit <http://community.foe.co.uk/contamination> to find out how to take further action and help us spread the word

## Quick response: 'In a nutshell'

I am writing to respond to the Government's consultation on GM 'coexistence'.

I am shocked that the Government has already decided to allow up to 0.9 per cent GM contamination of non-GM crops grown in the England without any prior public consultation.

It is essential that any 'coexistence' measures aim to eliminate all GM contamination, whether in organic or conventional crops down to the lowest limit of detection, currently 0.1 per cent. There must also be strict liability on GM companies for both economic losses and any damage to the environment. This is the only way that British farmers can continue to supply what British consumers want – GM-free food. The Government claims it is offering 'real' choice, but it is denying people the choice to avoid GM altogether.

The consultation dismisses the impacts of growing GM crops on gardeners, allotment holder and beekeepers, yet GM crops could contaminate both small scale produce and honey. Gardeners, allotment holders and beekeepers must be protected from GM contamination and informed about potential GM crops growing nearby.

I am very concerned that the Government is questioning the need for a GM public register. It is in the public interest to have a transparent and open system – people have the right to know where GM crops are being grown. Public registers are vital, and should supply detailed information in advance of any planting, and be accessible to everyone.

And rather than unworkable voluntary GM-free zones, I would like to see the Government supporting a change in EU law to allow local authorities and communities the right to decide whether GM crops can be grown in their areas or not.

## Ten Major Flaws

Below we have highlighted ‘**ten major flaws**’ in the consultation document that we are most concerned about, along with ideas for rebuffing them and arguing for a better approach.

### 1. GM contamination will become routine

The Government has already decided to allow up to 0.9 per cent GM contamination in conventional crops without public consultation and is now, in this consultation, seeking views on how to meet this target. They have chosen 0.9 per cent because this is the level of accidental GM contamination allowed in food before it has to be labelled as GM.

The consultation should include options for ‘coexistence’ measures that would aim to eliminate GM contamination of conventional and organic crops down to the lowest reliable limit of detection of 0.1 per cent.

#### Back up your case

- An independent legal opinion says the Government’s approach of basing ‘coexistence’ measures on achieving a GM contamination threshold of 0.9 per cent is “*fundamentally flawed*”.  
[www.foe.co.uk/resource/briefing\\_notes/coexistence\\_legal\\_situation.pdf](http://www.foe.co.uk/resource/briefing_notes/coexistence_legal_situation.pdf)
- Many food companies already require non-GM ingredients to be produced to lower thresholds of 0.1 per cent as a result of consumer pressure. The Government should help farmers who supply these companies to meet consumer demand for GM-free food.

### 2. Proposed separation distances between GM and non-GM crops are inadequate

Defra states that “*separation distances will be the key coexistence measure to limit cross-pollination between GM and non-GM maize or oilseed rape crops*” (para 45).

But the proposed separation distances will result in routine GM contamination of non-GM crops and food. Pollen can move over considerable distances and the impacts of growing GM crops are likely to be felt far beyond the separation distances proposed.

#### Back up your case

Below are the planned separation distances for oilseed rape and maize, and some examples of why they are inadequate. No separation distances are proposed for beet or potato.

- **Oilseed rape – proposed separation distance: 35metres**

Cross pollination rates of up to 1.8 per cent have been recorded over just 56m.

[www.hgca.com/document.aspx?fn=load&media\\_id=1460&publicationId=1805](http://www.hgca.com/document.aspx?fn=load&media_id=1460&publicationId=1805)

Bees can travel up to 5km when foraging, and favour oilseed rape plants.

[www.foe.co.uk/resource/briefing\\_notes/bees\\_honey\\_and\\_gm\\_crops.pdf](http://www.foe.co.uk/resource/briefing_notes/bees_honey_and_gm_crops.pdf)

The pollen beetle, a major pest of oilseed rape, is thought to be responsible for cross pollination of oilseed rape plants over 26km apart.

[www.defra.gov.uk/environment/gm/research/epg-rg0216.htm](http://www.defra.gov.uk/environment/gm/research/epg-rg0216.htm)

In spring 2000, it was discovered that more than 6000 hectares of farmland across the EU had been planted with GM-contaminated oilseed rape. The seeds came from Canada, and it is believed that contamination occurred due to cross pollination with GM oilseed rape, despite the four kilometre separation distances used.

[www.gmcontaminationregister.org/index.php?content=re\\_detail&gw\\_id=2&reg=0&inc=1&con=3&cof=2&year=0&handle2\\_page=1](http://www.gmcontaminationregister.org/index.php?content=re_detail&gw_id=2&reg=0&inc=1&con=3&cof=2&year=0&handle2_page=1)

- **Maize – proposed separation distances: 80 metres (forage maize), 110 metres (grain maize)**

Average cross pollination rates at a distance of 200m in a three year study were calculated to be 1.2 per cent, with up to 2.47 per cent cross pollination recorded in one year. The same study found a rate of over 5 per cent at 75 metres.

[www.foe.co.uk/resource/evidence/assessment\\_outcrossing\\_maize.pdf](http://www.foe.co.uk/resource/evidence/assessment_outcrossing_maize.pdf)

### 3. Voluntary measures are insufficient

It is unacceptable that the majority of measures proposed in the consultation to control GM contamination will be left to a voluntary industry code of practice. All actions that will help reduce GM contamination must be included in legislation. But Defra describe measures such as cleaning GM material from farm machinery and controlling GM volunteers (weed crop plants in following crops) as “*desirable but not essential*”.

Because no statutory separation distances are proposed for beet and potatoes, measures to control GM contamination from these crops will be left to an entirely voluntary approach. This is not acceptable. Defra also suggest that “*non-GM farmers will have a role to play in ensuring successful coexistence*”. GM farmers must be responsible for taking these measures; the burden should not fall on the non-GM farmer.

#### Back up your case:

- The importance of cleaning shared equipment after it has been used by GM farmers is underlined by Government research which showed that seed spillages and failures to clean combine harvesters are likely to be a significant source of GM contamination.  
[www.defra.gov.uk/environment/gm/research/epg-1-5-84.htm](http://www.defra.gov.uk/environment/gm/research/epg-1-5-84.htm)
- Controlling GM volunteers will be a long-term process – Government research indicates that some oilseed rape seed can survive for up to 16 years. The same research predicted that if GM volunteers were not controlled they would contaminate non-GM oilseed rape at levels greater than 0.9 per cent for 16 years.  
[www.defra.gov.uk/environment/gm/research/pdf/epg\\_rg0114.pdf](http://www.defra.gov.uk/environment/gm/research/pdf/epg_rg0114.pdf)
- Voluntary schemes do not have a good history in UK farming - previous voluntary schemes such as attempts to control straw burning by a code of practice, the Pesticide Safety Precaution Scheme and the voluntary code of conduct for pesticide use all had to be replaced by statutory approaches
- The Government of Luxembourg has proposed a 3km separation distance for beet as part of its coexistence measures.

#### 4. Organic farming is under threat

The consultation asks for views about whether a lower threshold than 0.9 per cent should apply for organic crops, for example 0.5 per cent. However, it says “*Defra considers that a 0.1 per cent (limit of detection) threshold would present serious difficulties and ultimately not be in the best interests of the organic sector*” (para 121).

One of the reasons consumers buy organic food is the guarantee that it is GM-free. If ‘coexistence’ measures allow any level of GM contamination in organic crops, it will be down to organic certifiers to enforce their current threshold of the limit of detection, currently 0.1 per cent. This will put increased costs on organic farmers, and the organic food industry will struggle to continue to produce the GM-free food that consumers want.

The Government should ensure that not just organic, but all crops are protected from GM contamination to the limit of detection, currently 0.1 per cent. And GM growers should be responsible for ensuring that their crops do not contaminate organic or conventional crops above the detection limit of 0.1 per cent.

#### Back up your case:

- The Government’s Organic Action Plan for England committed to increasing the market share of organics, with a target of 70 per cent of indigenous organic products being UK-sourced by 2010.  
[www.defra.gov.uk/farm/organic/policy/actionplan/](http://www.defra.gov.uk/farm/organic/policy/actionplan/)
- Organic farmers whose crops are contaminated are likely to lose their organic status. In Canada, farmers claim that contamination of oilseed rape is so widespread that their market has been wiped out.  
[www.saskorganic.com/oapf/index.html](http://www.saskorganic.com/oapf/index.html)
- In Spain, where GM crops are more widely grown, contamination rates of up to 12.6 per cent have been detected in organic maize. It is vital that the Government ensures this does not happen to organic agriculture in the UK.  
[www.greenpeace.org/raw/content/international/press/reports/impossible-coexistence.pdf](http://www.greenpeace.org/raw/content/international/press/reports/impossible-coexistence.pdf) (Chapter 9).

#### 5. Liability for damage is weak

If biotechnology companies are to be allowed to cultivate their crops in the UK, they must be held strictly liable for any damage their products cause. This includes economic damage if non-GM or organic farmers suffer contamination and cannot sell their products as GM-free, including any knock-on costs, as well as damage to the environment. However, the consultation does not make it clear who should be liable for damage, and damage to the environment is not covered at all.

Defra is leaning towards a voluntary, industry-led scheme, for compensating farmers for GM contamination above 0.9 per cent, instead of putting in place strict liability laws. This is because it is “*likely to be cheaper and more straightforward to establish and operate*” (para 170). Such a scheme is unlikely to offer the protection needed for conventional and organic farmers.

The consultation proposes that only direct financial losses are covered, ie the direct market value of the affected crop. This means that knock-on losses, such as if an organic crop is decertified due to contamination and the farmer subsequently loses

business due to a loss of reputation, would not be covered. Defra also seem unwilling to include additional losses, like testing crops for GM contamination, storing a contaminated crop separately, and extra transport costs. Any losses related to contamination of less than 0.9 per cent will not be covered.

GM farmers must follow strict rules to ensure that their crops do not contaminate neighbouring crops. Under no circumstances should organic and non-GM farmers have to suffer any additional costs to ensure that their crops are not contaminated by any neighbouring GM crops. There are some worrying parts in the consultation that put much of the onus onto the non-GM farmer to prove any contamination suffered was not their fault.

#### Back up your case:

- In North America and Canada, farmers who are found to have GM crops growing on their land, even as a result of contamination, have been asked to pay large sums of money to biotech companies or face legal action due to infringement of patent rights. In 2003 a report revealed that Monsanto had an annual budget of \$10 million dollars and a staff of 75 devoted solely to investigating and prosecuting farmers. See Monsanto vs US farmers: [www.centerforfoodsafety.org/Monsantovsusfarmersreport.cfm](http://www.centerforfoodsafety.org/Monsantovsusfarmersreport.cfm)
- Farm-saved seed accounts for over 40 per cent of arable crop seed sown in the UK. But contamination from GM crops may force farmers to buy certified seed or get their own seed tested, increasing costs. They will also be at risk of legal action from biotech companies if they plant seeds that have accidentally become contaminated. Defra's consultation acknowledges the issue, but simply concludes that it will not be a problem as long as farmers don't save oilseed rape seed for more than one year running.

#### 6. GM public register all but dismissed

The Government's consultation questions whether there is a need for a public register of GM crops claiming "*it would be difficult for the Government to justify imposing a detailed GM crop register, bearing in mind the costs and burden on farmers*". They conclude that there would need to be a "*particularly compelling reason*" to introduce such a system (para 181).

Friends of the Earth and GM Freeze believe there would have to be very compelling reasons for **not** having an open and transparent system. The public has a right to know where GM crops are being grown. For there to be any trust in the Government's handling of GM issues, it is essential that there is transparency and openness throughout. Public registers must be open and accessible to everyone, and include detailed relevant information in advance of any planting of GM crops.

The consultation argues that a detailed GM register is not needed because Defra has already planned a notification system where farmers intending to grow GM crops must notify their neighbours in case they plan to grow non-GM crops. But the notification system is seriously flawed:

- It only applies if your crop is within the specified separation distance (35 metres for oilseed rape). Strong evidence exists that cross pollination will take place well beyond this (see point 2 above). Many GM crops would be planted in secret leaving neighbours and future land owners in the dark

- Crops not placed on the market are excluded so, for instance, a fodder maize crop grown for a farmer's own dairy cows is not covered, despite the possibility that companies purchasing the milk may specify that no GM should be present in feed.

#### Back up your case

- The Royal Institute of Chartered Surveyors (RICS) warned that land values may drop for fields where GM crops are grown, and argued that people have a right to know if their neighbours are growing GM, as it may impact on their future land decisions and the value of their property. For example, GM oilseed rape seeds can persist for up to 16 years (See point 3 above). RICS advocate a web based land register for GM crops.  
[http://www.rics.org/NR/rdonlyres/F441B60F-0C91-4D31-A1BA-44BC16266523/0/gmo\\_register.pdf](http://www.rics.org/NR/rdonlyres/F441B60F-0C91-4D31-A1BA-44BC16266523/0/gmo_register.pdf)
- Farmers beyond the separation distance must be able to find out quickly and easily if GM crops are to be grown nearby. For example, they may be producing crops to a 0.1 per cent threshold required by many food companies.
- Individuals and organisations involved in nature conservation must have access to this information – eg the use of herbicides on GM crops is likely to impact on farmland wildlife.

#### 7. No protection for honey producers

The Government is not proposing to take any action to prevent GM contamination of honey because it claims that any GM pollen is likely to stay below the 0.9 per cent labelling threshold. But the image of honey as a pure and wholesome food is under threat from contamination, however much GM pollen is present.

Oilseed rape pollen is very attractive to honey bees which assist with pollination. For maize, bees will use the pollen as a source of food. Therefore honey is under threat of contamination with GM oilseed rape and maize pollen, if GM crops are grown in England.

#### Back up your case:

- During the Farm Scale Evaluations in the UK, when GM crops were grown in the open air, GM pollen was found contaminating beehives and honey. The British Beekeepers Association recommended that beehives should be sited at least six miles from the nearest GM trial field.
- In October 2004, Greenpeace Netherlands and a Dutch consumer association, found GM oilseed rape pollen in four out of ten samples. See [www.gmcontaminationregister.org](http://www.gmcontaminationregister.org)
- For further information see 'Bees, honey and GM crops' [www.foe.co.uk/resource/briefing\\_notes/bees\\_honey\\_and\\_gm\\_crops.pdf](http://www.foe.co.uk/resource/briefing_notes/bees_honey_and_gm_crops.pdf)

#### 8. Gardeners and allotments holders are left in the dark and at risk of contamination

Anyone who grows their own vegetables or saves seeds in a garden or allotment could be at risk of GM contamination, so they have the right to find out where GM

crops are being grown and to be protected from GM contamination. However, the consultation deliberately excludes gardeners and allotment holders because it makes the (false) assumption that their produce will not be sold, so will not need to be labelled if it contains GM.

In addition, the Government view is that because any GM crop approved for cultivation will be safe, there is no need to worry if a non-GM crop is contaminated. This view completely ignores the fact that the reason many people grow their own food is so they can be sure about its quality and would be horrified if it was contaminated by GM. Gardeners and allotment holders must be included in the scope of 'coexistence' measures.

#### 9. Environmental issues are neglected

GM contamination is self-replicating; if harm is caused it may be very difficult to 'clean up'. The consultation only covers economic issues associated with growing GM crops. It completely neglects any environmental impacts such as those resulting from cross pollination with wild relatives or the knock-on impact on farmland wildlife from the use of weedkillers associated with GM crops.

##### Back up your case:

- A legal opinion supports the view that the Government should include protection of the environment in any 'coexistence' regime.  
[www.foe.co.uk/resource/briefing\\_notes/coexistence\\_legal\\_situation.pdf](http://www.foe.co.uk/resource/briefing_notes/coexistence_legal_situation.pdf)
- The Government-sponsored Farm Scale Evaluations of GM crops found that growing herbicide tolerant oilseed rape and beet caused a negative impact on farmland wildlife.  
[www.defra.gov.uk/environment/gm/fse/results/fse-summary-03.pdf](http://www.defra.gov.uk/environment/gm/fse/results/fse-summary-03.pdf)

#### 10. Voluntary GM-free zones not good enough

Defra will offer guidance to farmers on setting up voluntary GM-free zones, although they are "*not advocating these*" and do "*not see them as necessary*" (para 182).

There is a growing demand across the UK and Europe for GM free areas. In the UK 60 local authorities have passed resolutions opposing GM crops in their areas, covering a population of 18.5 million people.

But *voluntary* GM free zones are unlikely to work in practice, due to the inevitable practical and legal difficulties in setting up and enforcing them, which Defra themselves highlight. The Government must actively support the democratic right for local authorities to decide whether or not GM crops can be cultivated in their areas. This includes investigating how EU law needs to change to include this right and ensuring that these local decisions are legally enforceable.

##### Back up your case:

- For more information about the demand for GM free areas from local governments in the UK and across Europe, see [www.gmofree-europe.org](http://www.gmofree-europe.org)

Further information:

Details of many more examples of contamination incidents around the world can be found on the contamination register produced by GeneWatch UK and Greenpeace at [www.gmcontaminationregister.org](http://www.gmcontaminationregister.org)

A detailed briefing describing the minimum measures needed to keep food chains, crops and the countryside free of GM contamination is available at [www.foe.co.uk/resource/briefings/gm\\_contamination.pdf](http://www.foe.co.uk/resource/briefings/gm_contamination.pdf)

Contacts

If you have any questions you can contact:

**Friends of the Earth**

Richard Hines

74 Kirkgate, Leeds LS2 7DJ

Tel: 0113 242 8153

Email [richh@foe.co.uk](mailto:richh@foe.co.uk)

**GM Freeze**

94 White Lion Street, London N1 9PF

Tel: 020 7837 0642

Email: [enquiry@gmfreeze.org](mailto:enquiry@gmfreeze.org)