

Memo

APRODEV Working Group on Food Security, Trade and Gender

To: ACT

With regards to: GMO food Aid to Africa

The Aprodev Working Group on EU Trade and Food Security Policies from a gender perspective has taken note of the discussions that are taking place in ACT and the LWF on the issue of GMO Food Aid. As Aprodev comprises agencies which are involved in both development and humanitarian aid activities, we appreciate the different perspectives which exist between those who approach the issue of GMO Food Aid from a development point of view and those who are engaged in emergency and humanitarian aid. The latter find themselves in a specific situation as they often work with food supplies provided by the World Food Program. We are aware of and concerned about a potential incoherence on the question of the use of GMOs for food and agriculture between those whose primary responsibility it is to provide food aid, and those who are engaged in promoting rural development. The different perceptions are related to different time horizons: food aid is a short term response to urgent food insecurity while rural development is aimed at finding solutions to more long term food security problems.

This memo is written as an attempt to contribute to the debate concerning the different perspectives which may exist between those who are engaged in humanitarian aid and emergency response and those who are involved in (rural) development projects and programmes. Since most of the members of the Aprodev Working Group on EU Trade and Food Security Policies fall in the latter category, this memo is written from a development perspective. It does, therefore, not necessarily represent the views of Aprodev as a whole but is simply meant as a contribution to an ongoing discussion aimed at trying to find common ground regarding the issues at stake.

GMOs from a development perspective

From a (rural) development perspective, the following questions are important:

- 1.) Which contribution does genetically engineered seed make in the South to reduce chronic poverty and hunger, and can it solve the food insecurity of the poor in the long run?
- 2.) Which role does the GM-technology play for sustainable rural development?

Not all APRODEV members have finalized positions on GMOs. However, as a typical document that might illustrate the perspective that many of us consider important, we include the "Bonn Declaration". This document, which is attached, was drafted during an international Workshop organized by EED, 1-5 November, 2004, in Bonn, parallel to an Intergovernmental Meeting of the Parties to the Convention of Biosafety.

All our rural development policies are geared towards sustainable agriculture. The control of peasants over their own seed, their self-determination of appropriate technology and participatory methods for improving locally adapted traditional knowledge is key to our rural development approach. Through our involvement in rural development projects and programmes we have witnessed the disastrous effects of the Green Revolution type of

agriculture, which relies on improvements through external inputs and intensification by agrochemicals and capital investment. We have learnt how important it is to rely on models of low-external input agriculture, which rests on the biological processes of soil improvement, biodiversity, mixed cropping and traditional varieties. In this approach, which effectively reduces poverty, the focus is on small-scale holdings in marginal areas and rain fed agriculture.

In our view, GM-technology has, so far, not proven any benefits to these farming and food systems, to marginal areas, farmers and crops. We do not know whether it ever will. The very principles of GM-agriculture contradict the premises under which we now operate in rural development.

We are not convinced that GM-agriculture and GM-free agriculture can coexist with each other. The genetic traits of GM-crops cannot be contained. They are bound to spread out and cross-pollinate with related plants in neighbouring fields. This is especially the case in poor farmers systems, where diversity and intercropping is the rule. If genetic sequences of GM-crops infiltrate into traditional fields, they have the capacity to contaminate the gene pool of traditional farmers' crops and to wipe out the characteristics of local genetic resources, on which semi-subsistence farming depends so much. This danger is a real threat to food security and the plant genetic resources of the poor.

Even more so, it could be a threat to global food security. Since many traditional farming areas are the genetic centres of origin of the world's most important food crops, it might also be a threat to the gene pool which is highly important for the future of humankind as a whole. This has happened, for instance, in Oaxaca/Mexico, when US GM-maize was introduced as food to remote places, to the cradle of maize on this earth. Unfortunately, some of the maize for food found its way into the fields of the farmers and contaminated the ancient varieties.

Therefore, it is difficult for us to accept policies (of churches and church-related organisations) which too easily allow the introduction of GM-food via emergency aid. Accepting GM-food aid can become a real threat to the food security of local farmers and to biodiversity for the whole of humankind (where there is a centre of origin). Combating hunger through short-term measures can contradict long-term food security.

Regulatory Framework

The regulatory frame on GMOs in national legislation and in the Convention on Biosafety differs for "GMOs for Food Feed and Procession" (so called: LMO-FFP)¹ and for "GMOs for release in the environment". The safety rules for LMO-FFP are generally less stringent in matters of risk assessment for environment, permissible thresholds and information requirements, based on the assumption that a strict distinction between food and seed can be made.

However, this assumption has proven to be doubtful and misleading. Especially for rural poor in crisis situations, where they have lost their own seed stocks, it is artificial to distinguish between food and seed. If the food given in aid programs is also a local staple crop, and if the food aid is given in form of whole kernels, poor farmers will always be tempted to save some of the food to sow it out as seed, when the next season starts. This close connection between food and seed makes it hard to differentiate between the kind of food aid and the kind of

¹ The Convention on Biosafety always uses the term „LMO“ instead of „GMO“ (living modified organism); LMO are used when specifically referring to the Cartagena Protocol; otherwise the term “GMOs” is used.

agricultural development that Churches are pursuing. The only way to avoid such effects is to withdraw from accepting whole kernels as food aid, but to require the maize to be grounded before distribution. At the same time, food aid to rural areas has to be complemented by seed aid prior to the next sowing season. We acknowledge that these requirements will raise the costs of food aid, that the food which is distributed will be more perishable, and that the seed aid increases the administrative burdens considerable, especially if it is locally-adapted seed, like land races from the area.

To ensure a coherent approach of the churches in their care for the poor, the positions which are taken regarding accepting or not-accepting GM food aid or to propagating or banning GM-seed in our own agricultural projects should be synchronized. We have to dismiss the notion of this distinction made in legislation. This distinction may be plausible in developed countries, where farmers can afford to be very selective in their choice of seed varieties. However, the poorer a rural community gets, the less distinction is made between food and seed.

In the course of the negotiations over the Convention on Biosafety, which eventually led to the so called Cartagena Protocol, churches and their partners have always argued against the provisions of Article 11 (and following paragraphs), which establish lower transparency rules for LMO-FFPs. To remain faithful to our long-term opposition, we plea for not accepting GMOs as ungrounded food aid in poor countries, especially if a national regulatory system is not yet in place.

Furthermore, we should like to point out that most of the African States have only just started to introduce GM legislation in their juridical systems. The presence of GM-crops in their countries, even if unintentionally introduced by GM-food aid or by adventitious presence in other shipments, will have a strong legal impact on the design of new GM-legislation. Countries that have once accepted unidentified GM-imports will come under enormous international pressure by some of the GM-exporting countries to continue with a lax practice when it comes to the regulation of future border measures. The argument is that once the stock of the crops in a country is contaminated, there is no way of reverting to GM-free agriculture and GM-restrictive legislation. This pressure will especially be targeted towards border measures for the transboundary GM-transfers, of which food aid and trade are part. It is not easy to reconcile accepting unidentified GM-food aid on the one hand, and requesting strict documentation and identification in commercial GM-trade on the other hand.

The Cartagena Protocol on Biosafety adopts the Precautionary Principle under Article 1 and acknowledges GM as a risky technology. Under the same Article 1, it establishes the right of each country “to ensure its own adequate level of protection in the use of GMOs resulting from modern biotechnology that might have adverse effects”. Under Article 2, para 4, it goes on by saying: “Nothing in this Protocol shall be interpreted as restricting the right of a Party to take action that is more protective than that called for in this Protocol.” From the 107 member states to the Convention, 85 are developing countries. Almost all African States have ratified this Convention. They did this in the clear understanding that it is in the interest of poor countries to have the highest possible safety standards in place, because of the vulnerability of their environment, socio-economic systems and health of their poor people. Thus, these poor States have already made a political decision by saying that they value safety more than the availability of cheap food. The unquestioned acceptance of food aid that may contain GMOs has to be seen as an attempt to undermine the Precautionary Principle for which poor countries have fought for so long and so vigorously.

Furthermore, the Cartagena Protocol shifts the burden of testing, inspection, identification and information to the GMO-exporting countries. Especially under Article 18.2, it establishes the obligation that LMO-FFP which are subject to transboundary movements shall clearly be subjected to controls as to whether they “may contain” LMOs and are “not intended for intentional introduction into the environment.” This provision puts an obligation on the exporting and the importing countries as well as the handling agencies to avoid, by all means, the “unintentional introduction (of GMOs) into the environment”. The first Member of Party Conference in Kuala Lumpur, which took place in February 2004, installed a Technical Working Group to establish detailed requirements for this purpose, including specification of the identity and any unique identification. According to the convention text itself, the requirements have to be adopted by September 2006. Therefore, we are at a very decisive point in time, when negotiations have been launched specify which kind of documentation and identification is needed in transboundary movements, including international trade in food and seed, and food aid that may contain GMOs.

Food aid handling agencies should not unconditionally accept any food aid, thereby precluding the negotiations from introducing the most stringent rules of documentation and identification, which are deemed necessary to protect the long term goals of bio-safety and health safety of society. They should refrain from laissez-faire practices for the time being until the international rules have been established and the national governments in Africa have decided upon the conditions under which LMO-FFPs will be allowed to enter their countries.

Appendix:

The Bonn Declaration

GMOs: A Threat to Food Sovereignty

We the representatives of civil society organisations, NGOs and independent/pro-people scientists from Africa, Asia, Europe and Latin America, meeting in Bonn, Germany, from November 4-5, 2004 with a view to discuss the effects of Genetic Engineering (GE) on our Food Sovereignty and to develop strategies for safeguarding, have reached the following conclusions and demands:

- **We affirm with** pride the mega diversity and the organic integrity that symbolise the rich and unbroken tradition of our agriculture, their vital interrelationship with our livelihoods and culture, the knowledge of the farming community especially that of women and indigenous peoples on which it is founded. We oppose genetic engineering (GE) which undermines all these values and the worldview that has nurtured these values.
- **We recognise** with great concern that GE as the latest manifestation of global industrial agriculture, displaces sustainable small-scale agricultural systems, destroys biodiversity, impacts human health negatively, appropriates our seed sources and people’s knowledge through IPR (intellectual property rights) processes. We oppose patents of life forms. This predatory nature of GE erodes the food sovereignty of our peoples and thereby undermines our national sovereignty. It is a threat to food sovereignty.

- **We dismiss** the notion that GE can contribute to combating hunger. Hunger is a political problem. We underline that we support the agricultural systems of our farmers that have the capacity to feed the people.
- **We discard** the notion that GE can coexist with other forms of agriculture because the contamination it creates is uncontrollable, inevitable and irreversible with a devastating impact on our environmental, social, economic and cultural existence.
- **We are convinced** that under the oppressive conditions of globalisation, our governments are coopted by the global capital, transnational corporations and trade agreements to allow the entry of GE into our countries. Therefore we strongly believe in the need to lobby our parliaments, governments and policy makers, engage in advocacy at local, national, regional and international level by forming rainbow alliances with farmers, fishers, indigenous peoples, women's organisations, independent/pro-people scientists, consumers, industrial and non industrial workers and churches in order to creatively campaign on these issues, in order to stop and prevent GE entering agricultural and food systems and to protect and preserve biodiversity and original knowledge.
- **We demand** that all dumping practices of food have to stop, especially if they also go along with GM transboundary movement, including food aid, cheap food supply and other marketing promotion mechanisms.

Berlin, Nov. 23th, 2004