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From the Foreign Secretary and Vice-President Professor RB Heap CBE FRS

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Our ref: RSWB

Dear Sir,

CONSULTATION ON WORK PLAN FOR AEBC

We welcome the opportunity to comment on the draft workplan of the Agriculture and Environment Biotechnology Commission and also welcome the move toward greater consultation with interested parties, which should be an important part of the development of work and research programmes throughout government.

The Royal Society first recommended an over-arching body to monitor biotechnology in the UK in its 1998 statement 'GM plants for food use', in that statement it was envisaged that such a body would monitor inter-departmental, and inter-disciplinary issues in biotechnology. The following roles were assigned to such a body –

- To monitor the impact, or potential impact, of GM crops on agronomic practices
- To consider the effects of GM crops in comparison with the effects of current agricultural practices in general on ecosystems and the environment as a whole
- To consider the mechanisms in place for the enforcement of the current regulations
- Review membership of relevant advisory committees on a regular basis
- Review available mechanisms for minimising gene transfer and make recommendations regarding further research. Investigate whether there is a need for strengthening existing mechanisms for isolation distances from food crops.
- Review mechanisms by which GM crops can be monitored in the environment and make recommendations for long-term monitoring of impact on ecosystems
- To liaise with bodies responsible for reviewing applications to use herbicides in order to monitor the impact of GM herbicide resistant crops on herbicide use, and the related long-term impact on the environment. Provide guidelines to growers of GM and non-GM herbicide tolerant crops
- To investigate the dissemination of information about GM crops throughout the supply chain in order for labelling schemes to be effective
- To consider whether long-term feeding studies are necessary to provide greater information on allergenicity or toxicity of GM food

The work programme as set out in the AEBC consultation document raises specific concerns in the following areas –

- Breadth of scope of the proposed topics and the need for strict prioritising of these topics
- On GM animals – There are currently many initiatives and studies underway from the Royal Society; the Animal Procedures Committee Biotechnology working party; the RSPCA, etc; the Working Group for Efficient Regulation; the House of Lords, etc. I have included the press release for the Royal Society study, which is due to complete in Spring 2001. We suggest that the AEBC confine their efforts to other areas of interest and wait until the results of the above mentioned studies are available for further analysis.
- The comments attributed to members of the AEBC recently regarding future developments of GM animals were not helpful to the debate, AEBC needs to ensure that there is proper representation of informed views about GM issues.
- On Farm Scale Trials – it is important not to duplicate the work of the scientific committee set up to advise on the trials. There is a need to urgently address the public concern about such trials, as further field evaluations are vital to obtain information about the environmental impact of GM crops. There is also an urgent need to address the possible implications of the recent court decisions regarding interference with the trials.
- The Commission need to make it clear how AEBC intends to gather relevant scientific (and other) evidence in order to address the issue of farm-scale trials and gene transfer
- There is no mention of GM non-food crops, which are likely to have an important impact on agricultural practices, and may have implications for the safety of human health and the environment. Such crops are also already under development. The AEBC should be looking at strategic issues such as this in order to plan for further scientific developments
- Liability – this will also be considered in the European context during the development of the new Directive, and possibly at a global level. It is important not to duplicate work already being carried out in this area

The Royal Society would be very happy to discuss these issues, and any other issues pertaining to biotechnology with members of the Commission or the Secretariat at any time. Please don't hesitate to contact us if you require further information.

Yours sincerely

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