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EU Regional Group

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Martin Scheele
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Copy to:

Jean Francois Hulot, Head of Unit, Organic agriculture

ECOB draft for a Best Practice Document for maize coexistence

Dear Mr. Scheele,

The IFOAM EU Group wants to comment the EC second report on the coexistence of genetically modified crops with conventional and organic farming (02/04/2009), outlining the activities undertaken in response to the Council request and providing an update on the state of implementation of national coexistence measures. The point 7.6 related to the Overview of National Coexistence measures, cross-border issues, the statement "There have been no documented cases of cross-border admixture of GMOs" (page 8), is not corresponding to the reality in at least one EU Country: Spain.

There are several contamination cases of organic maize found in Spain, which were denounced and published by Spanish Public Organic Certification bodies (in Aragón, Navarra), in agreement with the affected organic farmers and their organisations. These cases were found one year after the approval of GMO maize varieties for commercial growing in Spain in 2001, and after that, more than one case per year has been reported. However, Spanish authorities have not undertaken any further studies to find out the liability and origin of contamination in those cases. Furthermore, no more evaluation was done, to find out the contamination between conventional maize; a non-GMO production and GMO maize production.

In Spain, some contamination cases have been reported on organic maize production (Greenpeace 2009 (1); Bello et al, 2007 (2)).

The Greenpeace report has illustrated how farmers livelihood are damaged by the presence of GM crops, and shows serious contamination of non-modified crops is occurring in Spain and other EU countries whose government allows MON 810 on a commercial larger scale.

The second paper (Bello et al, 2007), shows how several GMO contamination cases on maize in Spain were not properly studied and that in some field situations; coexistence measures are difficult or impossible to achieve (p. e., in Ebro riversides agriculture and other).

However, none of these cases were taken into account for further analysis, neither by the seed industry who markets GMO seeds, nor by the different public administration bodies (national or regional), as it is stated by the current Spanish legislation (similar to the planned co-existence measures).

On the other hand, recently the Working Group on GMOs (GTOMG) of the Advisor Council on Environmental Issues (CAMA), as part of the Spanish Interministerial Council of Genetic Modified Organisms, has included a discussion point on the experiences of the affected farmers by the coexistence between organic maize and conventional GMO Maize varieties.

The Technical working group on maize of the European Coexistence Bureau has in October sent a first draft Best Practice Document for maize coexistence for stakeholder consultation, which was also commented by IFOAM EU. This document does not take into consideration the experiences made in Spain. By now, no study has been made about the socio-economic impacts of the mentioned contamination cases. Only a number of new studies made in Spain in cooperation

with the GMO seeds companies, are cited and their outcome is used to give some recommendations for future isolation distances for outcross GMO contamination in maize.

Therefore, we call on the European Commission to

- a) Consider the studies and contamination cases presented in this letter for the second draft of the best practice document
- b) To obtain an independent study that analyses the consequences of these contamination cases
- c) To add a reference to these contamination cases to the "Best practice document".

Expecting your consideration,
Kind regards

A handwritten signature in dark ink, appearing to read "Marco Schlüter". The signature is written in a cursive style on a light-colored background.

Marco Schlüter, Director of the IFOAM EU Group

and **Victor González**, Technical Director, Sociedad Española de Agricultura Ecológica (SEAE)

The IFOAM EU Group is the European working level within the International Federation of Organic Agriculture Movements. It brings together more than 300 organisations, associations and enterprises from all EU-27, EFTA and candidate countries. IFOAM's goal is the worldwide adoption of ecologically, socially and economically sound systems that are based on the principles of Organic Agriculture.

(1) Greenpeace, 2009. Testimonies of Contamination. This report describes the socioeconomic and human impacts of the presence of genetically modified (GM) maize and of genetic contamination in Spain based on experiences in 2007, mainly of organic producers who have been harmed directly or indirectly by contamination by Monsanto's genetically modified maize, MON810.

(2) Bello A; Porcuna JL; González V; Fabeiro C. 2007. Organic Farming integrity in maize cultivation in Spain. In: Stein AJ & Rodríguez-Cerezo E (2007). Third International Conference on Coexistence between Genetically Modified (GM) and non-GM based Agricultural Supply Chains. Seville 20-21st of November 2007 (Book of abstracts) 373-374pp. Edited by IPTS-JRC European Commission