

Nuffield Council on Bioethics

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The Rt. Hon. Hilary Benn MP
Secretary of State for International Development
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Director
Dr Sandy Thomas

Dear Minister

Deputy Director
Dr Catherine Moody

DFID's Agricultural Policy

Assistant Director
Mr Harald Schmidt

Thank you for giving the Nuffield Council on Bioethics the opportunity to contribute to the Department for International Development (DfID)'s consultation about its agricultural policy. We welcome the opportunity to submit evidence.

As you may be aware, the Nuffield Council has recently considered the potential contribution of genetically modified (GM) crops to agriculture in developing countries. I have pleasure in enclosing copies of the Council's publications on the topic: *Genetically modified crops: the ethical and social issues* (published in 1999) and a new Discussion Paper, *The use of genetically modified crops in developing countries*, published in January 2004. We highlighted some of the recommendations in this Paper in a letter sent to your department on 5 January 2004.

We support the view of DfID that agriculture has a fundamental role in the reduction of poverty. Many people are poor, and therefore hungry, because they can neither produce enough food on their small farms, nor obtain enough employment by working on those of others. Enhancement of yields on small farms tend to increase the demand and hence rewards for poor labourers. Improving the productivity of small farms is by far the best means of achieving a substantial reduction of food insecurity and poverty (paragraphs 2.4, 2.9-2.11).

We are aware that achieving food security and reducing poverty in developing countries are highly complex issues. We do not claim that GM crops will eliminate the need for economic, political or social change, or that they will feed the world. However, we do believe that GM technology could make a useful contribution, in appropriate circumstances, to improving agriculture and the livelihood of poor farmers in developing countries. We should like to draw your attention to recommendations in the Discussion Paper that are specifically relevant to DfID's agricultural policy:

- In particular cases, GM crops can contribute to substantial progress in improving agriculture, in parallel to the (usually slow) changes at the socio-political level. GM crops have demonstrated the potential to reduce environmental degradation and to address specific health, ecological and agricultural problems which have proved less responsive to the standard tools of plant breeding and organic or conventional agricultural practices. **There is an ethical obligation to explore these potential benefits responsibly, in order to contribute to the reduction of poverty, and to improve food security and profitable agriculture in developing countries** (paragraph 4.48).
- Much of the current privately funded research on GM crops serves the interest of large-scale farmers in developed countries. Consequently there is a serious risk that the needs of small-scale farmers in developing countries will be neglected. It appears that research on these crops will have to be supported primarily by the public sector. **We therefore affirm the recommendation made in our 1999 Report that genuinely additional resources be committed by the UK Department for International Development (DFID), the European Commission, national governments and others, to fund a major expansion of public GM-related research into tropical and sub-tropical staple foods, suitable for the needs of small-scale farmers in developing countries** (paragraph 6.16).
- **In determining which traits and crops should be developed, funding bodies should be proactive in consulting with national and regional bodies in developing countries to identify relevant priorities** (paragraph 6.17).

We note that DFID has agreed to an increase of £30 million over the next three years in support for CGIAR and we welcome this commitment. The role of the CGIAR in research on GM crops is

strategically important. But funding for the CGIAR has fallen in real terms since 1990. Although it spends about US\$360 million per year, less than 10% is directed to research on the genetic modification of crops.

Capacity building:

- It is of particular importance that developing countries improve their capacity to independently review and assess the use of GM crops in specific situations. **Since means for the development of the required expertise are limited in most developing countries, we welcome and endorse the United Nations Environment Programme and the Global Environment Facility (UNEP/GEF) undertaking of promoting the building of capacity in relevant expertise (paragraph 5.24 – 5.25).** We are aware that DFID currently supports this initiative and also seeks to devise guidelines for participation by the public in decision making processes for biosafety frameworks.

- Local communities should be included as far as possible in decision making processes, for example by means of consultations with stakeholders. In this context, formal and non-formal programmes that promote the dissemination of balanced information, communication, education and training of those involved are essential. In particular, farmers need to be informed about the technological potential and management requirements of GM crops. Expectations are sometimes inappropriately high, and knowledge about specialised farm management practices may be absent. **We recommend that companies marketing GM crops in developing countries share, with governments, the costs of:**
 - **locally appropriate schemes to elicit small-scale farmers' preferences regarding traits sought by GM-based breeding;**
 - **their participation, where appropriate, in plant breeding; and**
 - **subsequent mechanisms to improve dissemination of balanced information, education and training about the use of GM crops (paragraph 5.33).**

Impact of European policy:

- The freedom of choice of farmers in developing countries is being severely challenged by the agricultural policy of the European Union. Developing countries might well be reluctant to approve GM crop varieties because of fears of jeopardising their current and future export markets. They may also not be able to provide the necessary infrastructure to enable compliance with EU requirements for traceability and labelling. **We recommend that the European Commission (EC), the UK Department for International Development (DFID) and appropriate non governmental organisations which monitor the agricultural policies of developing countries examine the consequences of EU regulatory policies for the use of GM crops in developing countries. We recommend that the European Commission establish a procedure to report on the impact of its regulations accordingly** (paragraph 5.50).

Access to GM technologies:

The challenge for the public sector, especially where research is directed at agriculture in developing countries, is how to access GM technologies without infringing intellectual property rights (IPRs). New initiatives which recognise the potential of these constraints to inhibit research into crops relevant to developing countries are crucial.

There are some public/private partnerships which have been established in the past to make available GM technology owned by companies such as Monsanto or Syngenta for 'public good plant breeders'. There is also the recent initiative of the AATF which aims to promote the sharing of technology and has already received support from the major companies (paragraph 6.15). We note that DFID is providing £5 million to the new African Agricultural Technology Foundation (AATF).

- Access to plant genetic resources is critically important for the development of GM crops which are suited to the needs of developing countries. **We welcome the decision by the UK Government to ratify the International Treaty on Plant Genetic Resources for Food and Agriculture. Access to resources falling under the Treaty is of crucial importance in the development of crops suited to developing countries. We recommend that in the negotiations regarding the standard Material Transfer Agreement (MTA), the UK Government aims for provisions that exempt users in developing countries from payments, where commercial applications arise from**

material covered by the MTA. Where exemptions are not appropriate, differentiation of payments should take into account the level of development of the country in question (paragraph 5.15).

We would be pleased to discuss these issues with you in more detail.

Yours sincerely

Dr Sandy Thomas
Director