

The response reproduced below was submitted further to an invitation to comment on the draft Discussion Paper by the Nuffield Council on Bioethics: *The use of genetically modified crops in developing countries*, during June to August 2003. The views expressed are solely those of the respondent(s) and not those of the Council.

David Reece, UK

Dear Mr Schmidt,

Comments on draft of 'The use of GM crops in developing countries'

I enjoyed reading the above draft report, and feel that it represents an intelligent contribution to the current debate. Please note the following comments:

1. While the report mentions the Chinese experience with Bt cotton (Case Study 1, para 59 *passim*) and indeed uses this experience to support its central argument, no mention is made of a critical report on its environmental impact. The final version of your report should at least refer to the following Chinese study and consider the significance of its findings and conclusions. I refer to 'A Summary of Research on the Environmental Impact of Bt Cotton in China', by Dayuan Xue of Nanjing Institute of Environmental Sciences, State Environmental Protection Administration of China. This report was published (in English) by Greenpeace, and is available from their website.
2. I believe that your report should state more strongly and clearly that an effective regulatory regime *must* be in place before GM crops are introduced into a developing country (or group of countries). While the discussion on pp54-62 is adequate, it should state clearly and explicitly that the consequences of introducing GM crops into contexts lacking an appropriate regulatory framework may well prove disastrous, particularly for poor people. The experience summarised in footnote 186 p56 is of great significance, and should be given far greater prominence and be allowed to inform the argument of this section.
3. Finally, I believe that your report should consider the viewpoint expressed by Calestous Juma (*pers. comm.*) among others, that the introduction of GM crops represents a *radical* and *discontinuous* change in agricultural practice. While the examples that you discuss constitute incremental innovations, it is possible that the next generation of innovations will be associated with far more profound changes: initially in the factors underlying competitive advantage (for farmers) and thus in the social composition of the farming community and the social institutions around agriculture. While I do not necessarily endorse this view, I believe that it is worthy of consideration. Your conclusions should not be based entirely upon the technologies that are already near to commercial use (some people might see these as forms of Trojan horse!) but should consider the longer-term consequences that some foresee if these technologies are accepted at this stage.

I trust that these comments will be of interest, and I look forward to reading the final report in due course.

