



Coexistence of Genetically Modified, Conventional and Organic Crop Production

(Adopted in Berlin, May 2004)

Coexistence of various production methods is not a new concept to the agricultural community. Breeders and farmers are accustomed to breeding and producing different crops such as waxy and non-waxy maize, white and yellow maize, hot and sweet peppers, and high- and zero-Erucic acid oilseed rape, next to one another. They are also accustomed to producing certified seed differing in purity standards. This experience shows that coexistence of a wide range of production methods is not a problem, provided technical and procedural guidelines are carefully followed and cooperation between farmers in the neighbourhood is encouraged.

In the past decade production methods have been frequently classified into three main groups: conventional, organic and production using genetically modified (GM) crops. ISF considers the use of GM varieties part of the so-called conventional agriculture, as it is recognized in several important agricultural countries such as Canada, USA, China and Argentina. However, the need to label GM products and the definition of a de minimis threshold for adventitious presence of GM products in non-GM ones in other countries has led to this classification becoming accepted terminology.

Although the objective of this position paper is not to discuss the virtues of any type of production, it is useful to point out the context in which the debate on coexistence is taking place. In 2003, conventional agriculture represented 94% of all arable land worldwide, while GM and organic agriculture covered 4.4 and 1.6%, respectively. About 50% of organic agriculture is related to pastoral land for low intensity grazing in Australia and Argentina. Thus, in effect organic agriculture represents only about 0.8% of all arable land (FAO, IFOAM, ISAAA and ISF statistics).

This paper deals with coexistence from the perspective of the economic consequences of adventitious presence of material from one crop in another and the principle that farmers should be free to choose any production system, be it GM, conventional or organic. Therefore, the issue is not about product/crop safety, because GM varieties have obtained full regulatory approval in the countries where they are grown, but about the economic impact of the production and marketing of these GM crops. The adventitious presence of GM material in conventional and organic products is dealt with separately.

Conventional Products

In some countries GM products are treated the same as their non-GM counterpart as soon as they have been shown to be safe and authorized for food, feed and deliberate release into the environment. ISF strongly endorses this position. However, in countries where GM products are treated differently from non-GM ones, labelling of GM and GM derived products is compulsory and thresholds for adventitious presence of GM products in conventional products have been adopted as labelling trigger points, e.g. 0.9% in Europe, 4% in Brazil and 5% in Japan.

The adventitious presence of one crop in another crop can arise for a variety of reasons: due to seed impurities, cross pollination between neighbouring fields, volunteers, seed planting equipment, cultivation practices, harvesting and on-farm storage practices, post-farm gate storage and processing. The separation of different product lines in the field and to the consumer follows long established and functioning practices. As explained earlier the seed industry and its farmer-producers have shown this is possible. The development of new products and markets may require an adaptation of these practices.

Organic Products

In general organic farming regulations do not permit the use of GM varieties. Regulations in some countries allow establishing a specific threshold for the unavoidable presence of GM products. No known thresholds so far have been set.

In May 2002 the IFOAM World Board (www.ifoam.org) took the position '[...] the potential of GMO contamination does not alter the traditional approach of certifying organic as a "production method" rather than an end-product guarantee. Organic products are not defined or certified as being "free" of unwanted pollution. [...] Therefore IFOAM does not support the introduction of de minimis thresholds for genetic contamination. Because of this, mandatory testing for genetic contamination should not be introduced for the verification of organic production.'

ISF supports this position and believes that thresholds adopted for conventional products should apply equally to organic ones.

However, some bodies wish to apply a more stringent de minimis threshold on their members, and often 0.1% is considered as the limit of reliable detection. From the standpoint of ISF this is neither practicable nor reasonable. The push by some to use the limit of detection would set an ever changing and unreasonable threshold and the burden of a segment of the organic community's decision should not be transferred to the rest of the organic or farming community at large.

Some General Principles

Provided that thresholds for the adventitious presence of one product in another are practicable and reasonable, coexistence between the different kinds of agriculture is possible. Guidelines taking into account the crop and the farm structure have in some cases already been established. A standard that calls for a zero tolerance for the presence of GM crops in a non-GM production system is not consistent with production reality, and national requirements for other product standards.

Measures of coexistence should be efficient, cost-effective and proportionate. They should not go beyond what is necessary to ensure adventitious presence remains below the tolerance thresholds that may be set in the rules and legislation. They should avoid being an unnecessary burden on farmers irrespective of their mode of production, seed producers, grain handlers and other stakeholders involved.

Decisions have to be taken at an appropriate scale and priority should be given to farm-specific management measures and to those aimed at coordination between neighbouring farms. Political decisions such as 'GM free zones', which are equivalent de facto to the ban of one type of agriculture, are unacceptable. They in fact deny farmers, consumers and the whole food chain the right of choice.

Precedent already exists in specialised production sectors that the growers of the sensitive crop take responsibility for meeting any purity standards required to access those markets, particularly if the market standards are different from the legal norm. As in any other area of agricultural production, any potential liability will be determined by the existing liability provisions, notably contractual obligations, general civil liability rules, and product liability.

Conclusions

ISF reiterates that the adventitious presence of one product in another is not a new issue. The farming community and the seed industry have a long history of growing different crops side-by-side and producing pure seed stocks.

Coexistence is a purely economic issue and has nothing to do with product/crop safety. In countries where labelling thresholds for the adventitious presence of GM products in conventional ones exists, appropriate procedural and technical measures need to be established that separate the different product lines, thereby making coexistence possible. These measures must be specific, efficient, cost-effective, proportionate and implemented at the appropriate scale. In no case should they lead to the severe restriction or ban of one type of production.

No specific threshold for the adventitious presence of GM material in organic products should be established, as organic production and certification is process and not product based. In countries where labelling thresholds are applied for conventional products, the same threshold should be used for organic products. If lower thresholds are established for organic products, the responsibility to reach and guarantee them must rest with organic producers and the burden of their decision should not be transferred to the farming community at large.

The current legal systems provide long-established, proven tools to manage any potential liability issues - including in cases where farmers take the responsibility to grow crops that must meet special standards.