

**OPINION N° 2000-02 (July 2000) ON GENETICALLY
MODIFIED ORGANISMS (GMOs)**

The purpose of this Opinion is not to deal with all the problems raised by GMOs, but simply to take stock of the situation as it stands in July 2000 on crops alone and of the concerns we have in respect of sustainable development. However, the question of GMOs has allowed us to raise a certain number of difficulties in terms of the organisation of political power in the area of scientific and technical production, which oblige us to find a balance between political choices and scientific and lay knowledge. The proposals made in this document on GMOs also concern most other new technologies.

Further to two meetings with politicians, scientists and civil servants responsible for the GMO issue, the members of the CFDD have failed to obtain any information as to the advantages of genetically modified crops currently being planted, even regarding potential production per acre or the amounts of pesticides being used; indeed, it would seem that in North America the use of insecticides and herbicides has not diminished since the introduction of transgenic crops. Everyone agrees on the fact that the few studies that are available could not be considered to have been validated in the scientific sense of the term. Having discovered, however, that studies financed by different institutions were being carried out in France, the CFDD has requested that the terms of reference of these studies be made available to it, and it would like to have the opportunity of discussing the findings with the researchers involved in them. Apart from purely French studies, we need to make strict assessments of American and Canadian studies carried out on crops over a period of several years in those countries.

The CFDD concludes that in the light of the lack of precise information as to the advantages of GMOs, and therefore the absence of elements which could counterbalance the risks brought to our attention, the time is not ripe for decisions to be taken. It asks to be included in the steering committees responsible for assessing GMOs.

The CFDD notes that there is nothing currently available which would allow us to evaluate the impact of GMOs on the country's agricultural social fabric. This criterion is not taken into account in the prior assessment procedures which come before the market launch of GMOs. The CFDD asks that negotiations should be allowed to be re-opened for the re-introduction of economic and social criteria in the WTO. It emphasises that the free choice left to consumers – one of the criteria of sustainable development – implies at the very least the introduction of a two-speed regime. This has not been stated as a clear objective in the revision of Directive 90-220. The cost attributable to the introduction of GMOs, including accidental pollution, must be absorbed by the biotechnology companies and not by those involved in the traditional agro-foods sector.

The CFDD asks for evaluation procedures to determine the economic and social cost of GMOs and the cost of any future consequence of their use, which takes the two-speed nature of the market into account, so that these costs are collected from the biotechnology companies and not from traditional agro-foods businesses. This should also apply to the WTO.

The CFDD is struck by the lack of clarity that characterises French and European policies on the issue of GMOs. Decisions, which can be taken at a variety of different levels (local, national, European and international), often leave citizens with the impression that the European or international "constraint" invoked by the government is a manoeuvre destined to push through decisions which promote the economic interests of the industrialists to the detriment of those of citizens. Research policy in the area of transgenic crops, where budgetary allocations have been increased in favour of technology subject to a moratorium, and strongly contested in several parliamentary reports, is an example of this and aggravates the problems that it contends it has the capacity to resolve.

The CFDD thinks that the government should present the sense of its action more clearly on certain points, and report regularly on the ways in which it is moving towards its objectives. When the government commissions a report or an expert enquiry, it should make an analysis of that study public, explain how it is going about following some of the recommendations made and give the reasons why it has put other suggestions aside.

For sometimes contradictory reasons, the public feels that it is not sufficiently represented by those whose institutional function it is to do so: parliament, government, political parties, trade unions and even NGOs. Health and environmental crises which have confirmed dangers that have long been known have accentuated this feeling of distance between those who decide and those who suffer the consequences of those decisions. The scientific milieu, in the person of the expert, does not come out of this analysis unscathed.

The citizens' conferences are a means of expression which have to be developed in different forms. As already stated in Opinion 01 of the CFDD (March 2000), their purpose is to complement the other democratic institutions and procedures without replacing them or suggesting that they are able to solve every problem, and even less take decisions. Their main function is to cast some light on the issues to help politicians understand what their fellow citizens think and want.

The public decision-making process increasingly requires an expert enquiry beforehand. In numerous cases, the expert committees do not include representatives of civil society. In other cases, they are present but marginalised by the technical functioning of the committee.

The CFDD suggests that an autonomous "citizens' circle" should be set up, and that it should be in the style of the consultative committee for the evaluation of technologies (*Comité Consultatif pour l'Evaluation des Technologies*) (see Opinion 01), able to call on expert committees to ask them for explanations and justification of their analyses and conclusions.

The major choices in the area of research are made in an opaque way, in spite of the fact that they concern all our futures. Research is planned in the name of social demand and on-one knows how this is evaluated.

The CFDD asks that discussions are held to reflect upon how citizens can be involved in the definition of objectives in the field of research, within the major public bodies. This contribution of civil society would be useful most particularly for specific projects concerning sensitive issues like animal nutrition.

Besides, the CFDD is calling for the following, urgently:

- ? That the government examines the issue of the inappropriateness of current regulations on directed mutagenic technology,
- ? That the government injects some drive into the debate on nutraceuticals which is proving too slow and non-committal,
- ? That objective indicators be defined to measure "accidental pollution" and assess the ecological risks and the economic damage of GMO contaminations,
- ? That genetically modified crops that can produce their own insecticides are analysed in the same way as ordinary insecticides. For plants which have developed a resistance to herbicides, this new situation where the crop accumulates phytosanitary products creates the need for new studies on the toxicity of the herbicide produced and its metabolic waste,
- ? That the government recognises the insufficiency of directive 90-220 in terms of the evaluation of risks to human health. No method of health risk evaluation has been proposed in the technical annexes of the directive, which is equivalent *de facto* to the absence of a requirement for evaluation.