

The Director
Environmental Protection Agency
EPA Headquarters
PO Box 3000
Johnstown Castle Estate
Co. Wexford

**Public Consultation on Teagasc's Proposed Trial of Genetically Modified Potato Strain - (G0469-01, Reference No B/IE/12/01);
Representation from the Mayo Organic Group and other Concerned Citizens**

We have recently learned that Teagasc plans to carry out field trials of genetically modified potatoes on its Oak Park potato trial grounds this season..

No GM crops have been grown in Ireland to date, and over half our farmland lies in locally designated GM-free areas. The trials come at a time when an increasing number of countries and regions worldwide are imposing restrictions (eg China, Austria, Hungary) or outright bans (eg Peru, Greece) on GM crops. The reasons for these restrictions are twofold:

- the risks of contamination of conventional crops, including organic crops; the proven threat of genetically modified organisms to health and biodiversity, and the impacts on soil, water, heritage and traditional seed strains, pollinating insects and wildlife.
- the loss of control over national farming systems through the patenting of GM seed strains by multinational pharmaceutical companies, and increased reliance on their associated products, such as herbicides.

Both considerations apply in the present case. However carefully these trials may be supervised, there remains a risk of contamination. Teagasc's trial plot is unacceptably close to its own non-GM plantings, and to the farmland of three of Ireland's declared GM-free counties. The right of a region to remain free of GM crop contamination is enshrined in European legislation.

The series of trials which Teagasc has joined originated in 2010 with an application from BASF, the world's largest chemical company (B/BE/10/V2 03/11/2010, EC Joint Research Centre Institute for Health and Consumer Protection). Already in 2006 BASF had proposed trialling GM potatoes in Ireland, but was deterred by public opposition. There can be no doubt that commercial exploitation is the intended outcome of the current trial programme. If here in Ireland, with major risks for Irish farming, which should be the focus of a full public and political debate. If not in Ireland, we would ask why the Irish taxpayer is being asked to fund the research?

The policy decision against GM involvement taken at Government level in 2009 was explicitly in support of Ireland's interests as an exporter of high-quality food "*To optimise Ireland's competitive advantage as a GM-Free country*" (Renewed Programme for Government, 10 October 2009, p.11). Given the continuing substantial resistance to GM foods among European consumers, (cf eg *Eurobarometer 341, Biotechnology*), abandoning this policy would seriously damage our food-exporting prospects..

As members of the Mayo Organic Group, and concerned citizens, we call on the EPA to reject Teagasc's application. We further request that State funding for research should prioritise the open pollination and participatory breeding that will enable Irish farmers to safeguard our precious heritage and food for future generations.

Yours sincerely

Mary Corless, Chair, Mayo Organic Group

