

# GM crop co-existence in perspective

## A message from Bob Fiddaman – Hertfordshire Farmer

As Chairman of the UK farm supply chain group SCIMAC, I have been personally involved in the practical aspects of GM crop co-existence since 1998.

Co-existence means farmers can make a genuine choice between growing conventional, organic and GM crops, in line with the legal requirements for labelling GM products. It should not be treated as a pro- or anti-GM issue – the aim of co-existence is to permit choice and freedom to operate whatever the production method involved.

SCIMAC is not involved in regulating the safety of GM crops – that's the role of scientists and regulators. Nor are we responsible for fixing thresholds to distinguish between GM and non-GM products. Again, that's the job of politicians and regulators.

But SCIMAC **does** represent those sectors of the agricultural supply chain, from plant breeders and seed merchants through to farmers and grain handlers, who will deal with the issue of GM crop co-existence **in practice**. The 10 basic principles behind our approach are set out overleaf.

Through existing industry systems and practices, SCIMAC firmly believes that the UK farming and food supply chain can address the policy objectives on co-existence set out in Environment Secretary Margaret Beckett's statement to the House of Commons in March 2004, and specifically:

- that farmers growing GM crops should comply with a code of practice to ensure that unwanted GM presence in non-GM crops does not exceed the 0.9% EU labelling threshold;
- that options for providing redress should be available to non-GM farmers who, through no fault of their own, suffer financially because a GM presence in a non-GM crop exceeds the 0.9% labelling threshold.

SCIMAC members remain committed to finding practical solutions which will allow the responsible development of new technology, its co-existence with all other farming methods, and the provision of genuine choice to growers and consumers alike.

**Bob Fiddaman**  
SCIMAC Chairman



# GM crop co-existence – 10 key principles



**1. Co-existence is an economic issue – it is not about safety**  
All GM crops must undergo rigorous, science-based safety assessment on a case by case basis prior to their approval for commercial cultivation. Co-existence is not therefore concerned with safety, but with the implications for farmers of meeting market requirements in the context of a statutory 0.9% GM labelling threshold.

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**2. The need for co-existence measures will be determined by market demand**

GM crops offer another choice for UK farmers, who will only choose to grow them if it makes economic sense for them to do so. If there is no market demand, GM crops will not be grown in the UK.

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**3. A zero threshold is not achievable, but practical tolerance thresholds work**

In every crop sector, from certified seed to mainstream commodity production, practical tolerance levels are applied to define a crop's end-use quality and value according, for example, to its varietal purity or freedom from unwanted material.

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**4. Co-existence is not a new concept in farming**

The agricultural supply chain is currently able to service a range of market channels with different labelling and/or quality requirements, eg:

- certified seed and non-seed (commodity) crops
- industrial and food grade oilseed rape
- sweetcorn and forage maize

In each case, well-established practices are in place to deliver co-existence, including neighbour to neighbour communication, separation distances between crops, and careful segregation during harvest, storage and transport.

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**5. Co-existence is not a one-way street**

Since farming takes place in the open air, co-existence depends on well-established measures to ensure the integrity of crops destined for different market outlets. In practice, this involves mutual co-operation between farmers who share a vested interest in delivering products to meet their customers' requirements.

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## **6. GM growers cannot reasonably be expected to bear responsibility for the self-imposed marketing standards of others**

SCIMAC accepts that GM growers must bear the initial responsibility for delivering co-existence measures in line with the statutory 0.9% GM labelling threshold. Where voluntary marketing standards specify a lower threshold, however, GM growers cannot reasonably be held to account for these additional, self-imposed criteria.

## **7. GM crops introduce no new liability issues**

The key to effective co-existence is a sensible, agreed definition of good practice to define the boundaries of negligence and due diligence in respect of GM and non-GM crop production. This is the basis for existing principles of liability within UK law. Once GM crops are approved as safe for commercial release and marketing, there are no grounds to suggest they should be treated differently – in liability terms – from other equivalent non-GM products.

## **8. Experience of growing GM crops in other parts of the world confirms that co-existence is achievable**

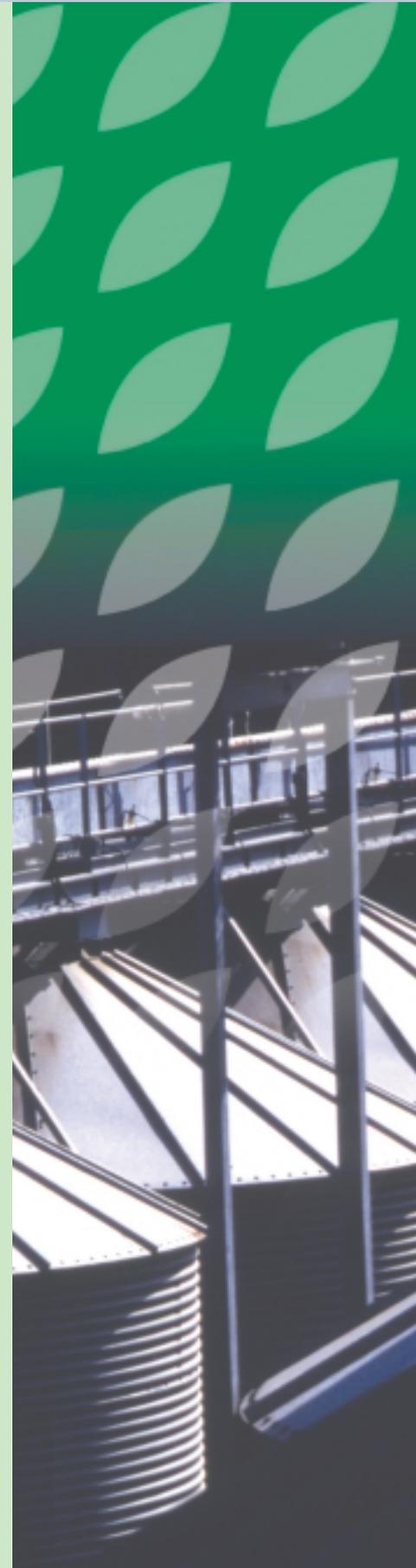
Where GM crops are grown commercially on a large scale in other parts of the world, there is no evidence over the past 10 years of farmers routinely suing each other or claiming compensation. Spanish farmers, for example, are now growing more than 60,000ha of GM maize without any specific provision for liability or compensation, nor any evidence over the past six years to suggest such a regime is necessary.

## **9. No one can predict whether new price differentials will emerge or be sustained between GM and non-GM value chains**

With the prospect of commercial GM cropping in the UK still some years away, SCIMAC would challenge the assumption that GM crops will always and inevitably trade at a discount. In Spain, for example, there is currently no price differential between GM and non-GM maize, other than on regular quality parameters. Where no price differential exists, there may be no potential for economic loss or liability.

## **10. Gene flow data offers a high degree of confidence that breach of labelling threshold would be extremely rare**

Based on the wealth of practical experience and scientific data now available, SCIMAC takes the view that breach of the 0.9% GM labelling threshold would be extremely rare where all farmers have complied with the respective co-existence measures. If GM (or non-GM) farmers are at fault through misuse of product or non-compliance, however, they should bear any responsibility – and cost.



The Supply Chain Initiative on Modified Agricultural Crops (SCIMAC) is a grouping of industry organisations along the UK farm supply chain, established in 1998 to support the carefully managed introduction of GM crops in the UK.

SCIMAC supports case-by-case, science-based regulation of GM crop technology, and is committed to delivering genuine choice and co-existence between GM and non-GM approaches to crop production. Here's what others say about us.

## Forum for cross-industry consensus

Since 1998, SCIMAC has provided a forum for consensus between all major UK farm supply chain bodies on a cross-industry approach to GM crop stewardship;

*'The NFU was a founder member of SCIMAC and continues to actively support it. The NFU's role as a member of SCIMAC ensures that the views and requirements of its farmer members, whatever their chosen production method, can be represented.'*

NFU policy statement, April 2003

## Blueprint for technology introduction

The SCIMAC initiative has been independently recognised as a potential blueprint for the managed introduction of other GM technologies within agriculture:

*'We welcome the role already played by UK farmers and others in the agricultural supply industry in the SCIMAC initiative. We recommend that the SCIMAC approach to best practice for the introduction of herbicide tolerant crops be extended to the broader issues of transitions in agronomic practice raised by GM plant varieties which have significant potential environmental impact.'*

Nuffield Council on Bioethics, May 1999

## Demonstrating that co-existence can work

The SCIMAC guidelines were applied and independently audited at over 280 field-scale FSE sites, with no loss of organic / non-GM status, and high levels of grower compliance;

*'Over the three year reporting period there has been a high level of compliance with the SCIMAC Code of Practice and Guidelines. No major non-conformances have been found in the eight Critical Control Points identified by SCIMAC.'*

ADAS Summary Report, May 2003

## A key opinion former in Europe

EU Commission Recommendations on Co-existence, published in July 2003, reflected the guiding principles set out in the SCIMAC approach.

*'The Commission has followed the SCIMAC project with great interest. It has provided valuable input to the Commission's considerations concerning the co-existence issue.'*

Kim Madsen, DG Sanco, July 2003

## International recognition

SCIMAC has worked hard to establish dialogue and co-operation with similar initiatives in other world areas;

*'Management systems such as SCIMAC (UK) have a great deal to offer all farmers, whether they be non-GM, organic or GM producers.'*

*'SCIMAC has developed a valuable package of practices for the introduction and growing of genetically modified crops.'*

RIRDC, Department of Agriculture Food and Fisheries, Australia, 2001

## A whole chain approach

SCIMAC has maintained strong relationships with other key stakeholders along the UK supply chain. These links will be increasingly significant as conditions for managing co-existence, traceability and labelling at a UK and EU level are developed.

*'DFE welcomes the SCIMAC initiative which will greatly facilitate the managed introduction of GM crops to UK agriculture and the provision of associated information along the food chain to food manufacturers and their customers.'*

Food and Drink Federation, UK

## Contact us

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