June 26, 2023

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on behalf of the Eco-TIRAS International Association of River Keepers (Moldova),
and the European ECO-Forum. Agenda point 4(d) Genetically modified organisms.
Aarhus Convention WGP-27

Dear Chair,

My current statement has a goal to attract the attention of the Parties, still not ratified the Almaty GMO amendment, to do that due to the necessity to take practical measures in favor of social-economic protection of the interests of their countries, as well as their environment and public health. The lack of regulations of public the participation in biosafety issues leads to GM pollution of its own crops, which is lowering the costs of agricultural production. It is especially characteristic to the EECCA region, where very many crops are already polluted with GMOs, and this factor limits the capacities of agricultural businesses to export soya, corn, and other products, and especially LMOs, to those countries, for which the biosafety issue is important and strictly regulating.

During the long period we observe, on one hand, the intention to weaken the public efforts to protect conventional crops by inaction and the delays of adoption of the biosafety legal framework and its implementation, where it exists, and on the other – the consequences of inaction – the high GMO pollution of crops in the countries, in which officially these GM organisms are not permitted and not exist.

This situation is especially related to the EECCA region. Due to weakness or lack of specific national legislation in EECCA countries, we observe the dramatic spread of GMOs on fields and the indifference of governments to that – the pollution is confirmed by sporadic tasting realized by the certified laboratories inside the countries or abroad.

The Almaty Amendment is neglected even in the countries which ratified it. Last year Moldova adopted a new law on biosafety, but both the government and the parliament rejected to include the references to the Aarhus Convention and the Cartagena Protocol, strictly following the EU Directive 2001/18/EC because the responsible for EU harmonization legislation body likes to follow the basic document. In our view, such an approach weakens the idea.

Special attention shall be given to local communities and farmers' participation in GM decision-making, to avoid or minimize the risks dealing with cross-pollination of the conventional crops. There are usually no mechanisms of public participation in GMO issues on a local level and even no intention to establish them. Meanwhile, they are really need taking into account the specificiety
of the rural communities. The public usually neither has the necessary expertise nor funding to monitor the situation created.

We see the necessity of additional efforts to enforce the Almaty Amendment implementation after it's coming into force when Ukraine will ratify it. We should welcome this intention of Ukraine as an EU association country. These efforts shall be taken in cooperation with the Cartagena Protocol Secretariat on implementation of its Art. 23. Being important to save biodiversity, the implementation of the GMO Amendment should be realized in close cooperation of the states with the public and mass-media, to minimize the consequent social-economic risks dealing with the costs of agricultural production for export, as well as the risks for the environment and the human health.

Thank you for your attention!