

Public Participation

Fourth Joint Aarhus Convention and CBD Roundtable regarding LMOs/GMOs

11-12 December 2023, Geneva, Switzerland

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The public

- not just the “average person on the street”, but also
 - farmers, bee keepers and other food producers
 - scientist of a wide range of disciplines
 - people in NGOs and other organisations who have been working on the issue for a long time
- providing input also on risk assessment and monitoring, as well as capacity building

Key systematic challenges

A decision
that a type of GMO
can be cultivate
anywhere
at any time in future.



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- the scope of a decision to allow cultivation
 - broad range of effects this can have
 - **versus**
 - centralized decision making
 - even more so for EU decisions

Example

- currently no commercial cultivation in Aarhus countries (source BCH):
 - last approval procedure in the EU more than a decade ago
- many Aarhus Parties have or are developing rules on biosafety, GMOs etc.

Example: cultivation

- communication & forms of public participation have changed
- no current example due to absence of cases on GMO decision-making



Greenpeace 2010 or earlier

Example: LMOs for food & feed

- import approvals given by the EU
- centralized process by EFSA and EU Commission
- public participation as written comments
- decisions can even be taken against the will of part of the EU member states

Example:

Labelling, Cultivation Registers

- Labelling allows the public to take **individual** decisions **after** a GMO/LMO has been approved for cultivation or import
- Cultivation registers (depending on details) allowed farmers and bee keepers to avoid direct contact with GM cultivation

Positive trend



growing importance of the Biosafety Clearing House (BCH)

- with publicly accessible information about GMOs/LMOs
- obligation of Parties to add information on ongoing processes
- trainings, roster of experts, background information
- capacity building

Negative trends

- attempts to exclude new types of GMOs
 - from approval and other decision making
 - from risk assessment
 - from labeling and registers
- in the CBD negotiations as “Synthetic Biology”
- by a proposal of the EU Commission to deregulate many GMOs as “New Genomic Techniques” (NGTs)

- “[Of] those plant applications affected by the EC proposal, 94% would be classified as NGT1 and thus would receive a market approval without risk assessment, monitoring and sufficient labeling provisions.”

based on the ‘plant breeding commercialization pipeline and licensing agreements’ list of Swiss Federal Office for the Environment

94% = 80 different plants incl. wild plants and trees

Where Does the EU-Path on NGTs Lead Us?

Bohle, Schneider et al. Federal Agency for Nature Conservation (BfN, Germany), preprint 2023

doi:10.20944/preprints202311.1897.v1

- No decision making = no public participation
 - especially **without** public participation
 - in a decision to deregulate GMOs

Way forward

No deregulation

but better decision-making processes
including in risk assessment