

"Eco-TIRAS" International Association of River Keepers A.O. Asociația Internațională a Păstrătorilor Râului "Eco-TIRAS"

Post and office address: Str. Teatrală 11A, Chişinău MD 2012, Moldova Tel. /Fax: (+373-22) 225615, E-mail: ecotiras@mail.ru http://www.eco-tiras.org Fiscal Code: 1012620005971

July 2, 2024

Ilya Trombitsky 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-28

Dear Chair, dear Colleagues,

Sooner or later, the GMO Almaty Amendment will come into force. And those countries that have already ratified it or intend to ratify or access it must take a number of legislative steps to ensure its application at the national level. As is known, the content of the amendment, like the Aarhus Convention as a whole, is not aimed at assessing the safety of genetically modified organisms, but at informing about features and potential risks of concrete GMOs and supporting public participation in these decisions. And in this regard, it is extremely important to take measures to ensure that all interested parties have the opportunity to participate in decisionmaking.

Meanwhile, national legislation usually does not divide the public depending on the specific interests of various groups. In this case, the most potentially interested and at the same time the least informed groups, primarily rural communities and farmers, may usually suffer. In countries where farmers are not united in powerful associations, they themselves must protect their interests. The interests of farmers growing conventional and organic crops are to prevent their contamination with GMOs, for example, by adopting and implementing legislation on the coexistence of crops. Such documents should contain provisions to ensure that farmers in the areas where GMOs are introduced are informed and that they can participate in decision-making, including in assessing socio-economic risks. Therefore, the legislation on the implementation of the amendment should contain special procedures for involving rural communities and farmers in making such decisions. As a rule, such provisions are not yet available in national biosafety legislation or are set out in a very general way.

These legislative measures should be taken now, without waiting for the amendment to enter into force. Such actions should also be taken as part of the measures to implement Article 23 of the Cartagena Protocol. This will also facilitate the ratification of the Amendment by those parties to the Aarhus Convention that have not yet done so.

Thank you for your attention!