

Rt Hon Hilary Benn MP
Secretary of State for the Environment, Food and Rural Affairs
Nobel House
Smith Square
London
SW1P 3JR



29 July 2009

By post and email

Dear Mr Benn,

Re: Secrecy of GM Potato Trial, Bramham, North Yorkshire

I am writing to express our deepest concern about the continuation of the GM potato trial at Bramham, North Yorkshire without the Public Register of active consents GMO Part B releases being updated to reflect this fact. This morning the entry in the register for this trial reads as follows:

07/R31/01	Centre for Plant Sciences University of Leeds Leeds LS2 9JT	Bramham, West Yorkshire	SE 438 414 Trial destroyed 5/6 June 2008
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Anyone reading this entry would assume that that the site has not been planted in 2009. I am aware of Defra's justification for the failure to update the register, which can be summed up as, "The map reference is the same as last year, and the release consent allows for potatoes to be planted in 2008, 2009 and 2010, and therefore there was no need to update the register."

Whilst this justification may be technically "legal", we believe that Defra's decision does not follow the spirit of the law and the intentions of those who drafted it. We have always assumed that the purpose of the Public Register is to keep the public informed about what GMOs have been released (where, when and for what purpose). The consent for the Branham sites (condition 5) requires that:

The consent holder shall provide to the Secretary of State

- (1) the six figure grid reference of trial site*
- (2) a plan showing the location of the trial site*
- (3) details of the GM potatoes to be planted*

at least one week before GMOs are planted in each year of the trial. Any deviation from the plan must be notified to the Secretary of State in writing as soon as practicable and in any event before planting of the GMO takes place.

I assume that Defra was in receipt of this information from the consent holders in 2009 and therefore do not understand why the current year's plantings has not been included on the public register, unless Defra wishes to keep neighbouring farmers, landowners and local elected representatives in the dark. If the purpose of the public register is to keep the public informed so they can take any actions they feel appropriate to protect their interests, then the current approach to maintaining the register by your department is flawed. In the current case at Branham, people would most likely have assumed if they had consulted the register that there had been no activity on the site, since it was cleared in June 2008.

GM Freeze believes that the location of GM test sites must be open and transparent. Any moves towards making GM test sites secret or to force them on unwilling populations would only serve to increase public concern and hostility towards GM test sites and further undermine public trust in the regulatory process.

It is very easy for the ag-biotech industry and its supporters in Government and elsewhere to blame direct action for the lack of GM test sites in the UK when the real reason is because there has been a widespread rejection of this technology for scientific and socio-economic reasons, as set out below:

- GM herbicide tolerant oilseed rape and beet were not approved because of evidence of long-term harm to farmland wildlife, so no further tests were needed.
- There is no market for GM crops because most supermarkets and manufacturers banned GM ingredients, so there was no reason to test new crops.
- Monsanto abandoned plans for GM cereals because of lack of EU markets demonstrated by public rejection of GM products, so testing no testing was needed.
- Bayer Crop Science halted work on GM maize even after being given approval by the UK government, so no further test sites were needed.
- The biotech industry has not come forward with any insect resistant crops that would find a market in the UK because pest levels do not merit them, and therefore no testing has been required.
- Modern applications of traditional plant breeding are progressing and producing good quality crop varieties without resorting to GM, eg marker assisted breeding.
- All GM seed varieties which had been entered for National Listing were voluntarily withdrawn by the applicants because of lack of market demand, thus removing the need for further outdoor testing.
- The National Assembly Government of Wales the Scottish Government have been strongly opposed to GM crops on the grounds that they do not fit with the model for developing farming in the two countries and no test site applications have been made.

Our research on damage to GM test sites (including all the FSE sites) throughout the UK since 2000 has revealed that 77% were not subject to direct action, and the majority of the 23% of sites which were vandalised continued and produced results. Thus claims that the majority of sites have been vandalised are not correct. See full briefing at <http://www.gmfreeze.org/page.asp?ID=368&iType=1084> for details of this analysis.

GM Freeze requests that the GMO Public Register is kept fully up to date in future all including plantings in the current year.

We also believe that Defra is failing in its aim of promoting sustainable agriculture by not funding on-going research into and extension of agroecological approaches to dealing with potato cyst nematodes infestation. Indeed, the build-up of the pest can largely be attributed to the bad farming practice of growing potatoes too frequently on the same land and poor sanitary procedures allowing cysts to be moved from field to field and between farms by farm vehicles. We made these points in our submission to Defra at the time the application for the Branham trials was made and included several alternative agroecological approaches, including extending periods between crops and trap crops (see http://www.gmfreeze.org/uploads/PCN_potato_response.pdf). It is a continuing concern to us that Defra is failing to develop a co-ordinated agroecological research programme in the UK to allow farmers to adjust to changing environmental and economic conditions in an ordered way.

We look forward to receiving your assurance that the failure to update the Public Register this year was a one-off and that the Government remains committed to the full openness and transparency over the location of active GM test sites.

Yours sincerely,



Pete Riley
Campaign Director.

cc Nick Herbert MP
Tim Fallon MP
Elin Jones AM
Richard Lochhed MSP
Michelle Gildernew MLA