

Comments on CEC Draft Report on Maize Biodiversity

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Scientists can assess the quality of the scientific review provided by the authors of the chapters of the CEC draft report on transgenic maize. Coming as I do from an economic research institute that has carried out collaborative research with Mexican economists on maize and the environment under NAFTA, I will offer only a brief summary of conclusions I draw from the text of the draft chapters of the report. This is not intended as an exhaustive summary, of course, but rather a logical set of conclusions that follow from the studies. I think the work overwhelmingly points to the need and justification for taking a precautionary approach to this matter, most notably by restricting corn imports from the United States into Mexico in new ways that can prevent future contamination.

The conclusions I draw from the studies are as follows:

1. Contamination has happened, and this has been proven. It is still happening, and under the current set of rules and laws it will undoubtedly continue.
2. Those who have suffered the contamination have never asked to participate in any experimentation with the potential of GM crops, nor are they now expressing any willingness to do so.
3. The field tests that have been done on GM maize tell us little that is relevant to Mexico about its long-term effects:
 - a. there are no long-term studies;
 - b. what studies have been done took place in agricultural and ecological systems very different from those in Mexico.
 - c. the scientific evidence shows that there is still a great deal that is not known about impacts at all levels.
4. It is not too late to take action to protect traditional varieties of Mexican maize. Contamination can be halted, and there is a good chance existing damage can be remediated.
5. Maize diversity is a global common good, of value not only to indigenous Mexican communities but to all of humanity. Therefore, the interest in taking action on this issue is greater than just a local or national interest.

6. While contamination with current varieties of GM maize may present relatively low risks (and there was not consensus on this point), future GM varieties are likely to pose much greater risks.
7. The likely source of most of the contamination was imported corn from the US. Controlling contamination is thus linked to controlling trade.
8. The Mexican government has at its disposal a variety of measures it could take to limit contamination, most notably restricting imports in new ways.
9. Given the unequal distribution of the risks and benefits of GM maize, there are many reasons not to rely on strict risk-benefit analysis; the alternatives presented in the studies are informed consent and precaution.
10. This process has demonstrated that with a high level of information, local communities are not prepared to consent to GM contamination or experimentation. The only appropriate approach is precaution.
11. A precautionary approach necessarily involves both continued restrictions on GM cultivation in Mexico and expanded restrictions on imports from the United States.