



ROYAL COMMISSION ON ENVIRONMENTAL POLLUTION

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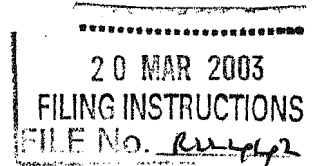
From the Chairman
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Dear David

RCEP REACTION TO THE GM SCIENCE REVIEW

Thank you for your letter of 2 December drawing the Royal Commission on Environmental Pollution's attention to the GM Science Review.

The Commission has commented on the regulation of genetically modified organisms on a number of occasions, most recently in 1999 when we responded to review of the framework for overseeing developments in biotechnology. Our earlier reports on the subjectⁱⁱⁱ set the scene for much of the subsequent regulatory structure covering releases of GMs into the environment, and in doing so addressed, at a very early stage, some of the key themes now raised again through the Science Review.

However, on this occasion, as in our 1999 response, our concerns are more about the process of the GM Dialogue than the science of GM issues. We welcome the Dialogue in principle - there are many serious issues that fully merit the integrated consideration that this dialogue could bring. But we wish to draw attention to our Twenty-first Reportⁱⁱⁱ in which the Commission made recommendations regarding methods of incorporating scientific and technological understanding with economic appraisal and an articulation of people's values into environmental policy making.

'Value questions are necessarily posed when standards are set and scientific, technological and economic appraisals should be supplemented in ways which allow these questions to be properly considered, in order to elucidate the consequences of setting standards... There should be opportunities for the public to exert an influence on what happens at each stage.'

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The Government's response to the Twenty-first report fully endorsed this conclusion and we welcome the fact that the GM Dialogue seeks to cover all these aspects. We fear, however, that the separation of the strands into three discrete fora will make the true integration of the debate difficult. The Commission perceives a risk that each strand will reach an artificial conclusion if not fully informed by the proceedings of the others.

The Twenty-first report advocated taking people's values into account 'from the earliest stages of defining the problem and framing the questions that need to be addressed'. We also discussed how these values could evolve under the challenge of scientific assessments and other relevant information, and recognised that the scientific, technological and economic arguments surrounding an issue can be valuably informed by public attitudes and concerns.

Your letter of invitation says, rightly, that the GM sciences issues that interest and concern the public and the scientific community must drive the science review. But the national Public Debate is only just about to start, and will hold its conferences, debates and meetings around the country between May and July, and is not due to report until the autumn. It seems impossible that the values articulated in that process could inform the Science Review or Strategy Unit's Economic Study, which are still due to publish their results in May and June respectively. Reconvening the science and economic strands in the autumn following the closure of the Public Debate might help, but we see a real danger that their conclusions will already have been cast - or at least the public would be justified in perceiving that to be the case.

So, by keeping the three strands so clearly separated from each other, and by challenging the scientific community to offer evidenced-based views considerably before the public debate has had an opportunity to articulate the issues of concern, the process appears to be in danger of missing an opportunity to adopt the full iterative and integrated approach to scientific policy making that we advocated and that is so clearly essential in the GM debate. Of course we recognise that the process is already well under way, and the features of it that we would have wished to see different are somewhat fixed. What, then, might we recommend?

To begin with, we believe that the GM Dialogue would still benefit from a clearer articulation of the intention to use the public debate interactively to inform the science review. We are disappointed that the proposed Memorandum of Understanding regarding the interaction of the three strands, proposed for production by the Steering Group for the Public Debate, has not yet been published, and would urge that this be completed.

The science process then needs to enter a second stage much sooner than currently planned, timed so that it can be linked explicitly to, and indeed be part of, the public debate. In particular, those wishing to participate in the science and economic reviews must be able to seek guidance through the public debate as to issues on which they should concentrate. The recent announcement of the increased funding and the extension of the deadline for the Public Debate may help.

Interaction through public debates, as intended, can of course be used to further the interaction we recommend, but only if they are structured specifically to bring together the lay and expert opinions, and to stimulate meaningful dialogue. This will require thoughtful planning to make it clear to participants that there are genuine opportunities to influence and learn from each other, and that the experts' opinions are not already fixed through the review processes that have already taken place.

The Commission believes that this Dialogue represents a valuable opportunity and welcomes the openness with which the strands appear to be operating. However, we believe that without clearer mechanisms and better prospects for a fully integrated process, this opportunity will be wasted and an artificial result will be all that is achieved.

Yours ever

Tim Buzell

cc. Professor M Grant, Chair of GM Public Debate Steering Group
GM Crops Team, Strategy Unit

ⁱ The Release of Genetically Engineered Organisms to the Environment (Cm 720, 1989)

ⁱⁱ GENHAZ A system for the critical appraisal of proposals to release genetically modified organisms into the environment (Cm 1557, 1991)

ⁱⁱⁱ Setting Environmental Standards (Cm 4053, 1998)