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Mariam Mayet
African Centre For Biosafety

By fax (011) 482 8915

Dear Ms Mayet

RESPONSE TO OPEN INVITATION BY CSIR FOR THE DEVELOPMENT OF GUIDELINES TO
IMPLEMENT THE PROVISIONS OF SECTION 78 OF THE BIODIVERSITY ACT

Earthlife Africa eThekweni support your submission on the above issue. Earthlife Africa have on numerous occasions complained to provincial Departments of Environment that they have been neglecting their duty under NEMA by failing to require Environmental Impact Assessments for releases of genetically modified organisms within their jurisdiction.

We note that the provisions of the GMO Act are inadequate in protecting South Africans from risk, and that as a civil society organisation it has been difficult to access information on events and where we have succeeded in doing so the information provided has been solely what the proponents of the GM event have wanted to release to the public. There is an urgent need for unbiased and independent provision of information on GM events being made available to public scrutiny in the process of deciding whether GM events should be released into the environment. The provision of this information must be legally binding and not merely encouraged. We therefore, support the call to develop a set of comprehensive Ecological Risk Assessment (ERA) Regulations for South Africa that includes the widest definition of environment and ecology to include socio-economic impacts.

We agree that at this late stage in the commercialisation of genetically modified organisms (GMOs) in South Africa that the development of a regulatory framework for assessing the risks and impacts

of GMOs should not be unduly rushed, but rather a comprehensive procedure must be developed with adequate consultation with civil society including groups that will be economically, socially and morally impacted by GMOs.

Until such time as an adequate ERA is put in place, we call for an immediate moratorium to be placed on all environmental releases of GMOs.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Black', with a stylized, cursive script.

Vanessa Black

For Earthlife Africa eThekwin