

Summary of the submission by COAG (Coordinadora de Organizaciones de Agricultores y Ganaderos / Coordinator of farmers' and livestock farmers' organisations, Spain) in the framework of the consultation of the Advisory Group on Rural Development on the European Coexistence Bureau and the Best Practice Document for maize crop production on 10 October 2008:

**Coexistence between genetically modified crops and conventional and organic crops.  
Best Practice Document for maize crop production  
Position of COAG**

COAG states that the theory of coexistence between genetically modified (GM) crops and conventional and organic crops depends on the compliance with two hypotheses. First, non-GM growers know where GM crops are cultivated so that they can try to avoid gene flow that could negatively affect their non-GM seeds, crops and harvests. Second, it is postulated that avoiding gene flow from GM to non-GM crops is feasible. According to COAG, there is enough theoretical and practical information to reject both hypotheses and therefore COAG states that coexistence between GM and non-GM crops is impossible.

COAG declares that instead of elaborating crop-based coexistence rules, the EU legislation should be adapted to allow non-GM agriculture to be under the protection of the law.

COAG states that coexistence as it is understood, regulated and implemented in the EU, will lead to the disappearance of agricultural production free of Genetically Modified Organisms (GMOs). Subsequently, the only way to guarantee a 100% GMO-free production would be to completely avoid GM crop cultivation.

COAG describes in the document the basis for its position:

- As mentioned, according to COAG coexistence is impossible, 4 documents are referenced for support of this statement :
  - Soil Association 2002: Seeds of doubt. North American farmer's experiences of GM crops
  - EHNE 2007: Analysis of the characteristics of crops in the Basque Country in the context of the introduction of GM varieties in crops not targeted at human or animal food and feed (only available in Spanish).
  - Greenpeace 2006: Impossible coexistence.
  - Greenpeace 2008: Coexistence remains impossible (only available in Spanish).
- According to COAG, the EU builds coexistence on a wrong basis:
  - Tolerance of up to 0.9% GMOs in conventional and organic products is incompatible with 100% GMO-free production
  - Any contamination of conventional and organic products is not accidental or technically unavoidable since pathways for admixture are known and not using GMOs would solve the problem.
- According to COAG coexistence rules are insufficient in many aspects regarding e.g. information provision, obligatory consultation of interested parties, liability schemes as well as public registers of GMO cultivation. COAG provides a list of elements that should be considered.

Furthermore, COAG makes reference to the absence of a public register in Spain and its implications for farmers not cultivating GMOs.

Finally, COAG also "considers as inappropriate the document *Best Practices for maize crop production*, presented by DG Agriculture and Rural Development of the European Commission at the Advisory Group on Rural Development meeting of 10 October 2008". The reason given by COAG is that "the document does not provide the right basis for a truly technical and practical work that guarantees conventional and organic agriculture and food to be free of GMOs".