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Andre Giacini de Freitas
Forest Stewardship Council (FSC)
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Re : Document reference code: FSC-POL-20-002 V3-0 D1-0 EN

24 June 2007

Dear Mr. Giacini de Freitas:

At your request for public comment regarding revisions to the FSC policy on the implementation of Criterion 1.6 of the FSC Principles and Criteria, the Public Research and Regulation Initiative (PRRI) submits the following for your consideration by the FSC.

The PRRI is a worldwide initiative that offers public researchers involved in modern biotechnology a forum through which they are informed about and involved in international discussions that are relevant to their research, such as your call for reactions to the draft FSC policy document.

While warmly supporting the overall objective of the FSC to strengthen sustainable forestry, we have a serious concern regarding element 5 of your draft policy document on implementation of Criterion 1.6 by Forest Management Enterprises (Document reference code: FSC-POL-20-002 V3-0 D1-0 EN), where it is stated that *there will be no planting of genetically modified trees*.

PRRI believes that this statement is inappropriate because it suggests, without any scientific substantiation, that GM trees cannot contribute to sustainable forestry.

This is based on a severe misperception and the consequences of such a blanket policy statement would be very detrimental to the aim of sustainable forestry.

As you know, public research groups in government institutes, academia and international organisations in developed and developing countries all over the world dedicate their knowledge, time and resources conducting research to strengthen sustainable production of food, feed and fibre; overcome limiting resources such as water; improve health care; and preserve the environment. A significant portion of the ongoing public research focuses on forest trees and fruit trees. The case for research with genetically modified trees in plantation forests and related environmental benefits have been long established in the scientific literature (e.g., see the papers by Strauss et al. 2001, and by Richardson and Petit 2005, among many others).¹

¹ Richardson, D.M., and R. J. Petit. 2005. Pines as invasive aliens: Outlook on transgenic pine plantations in the southern hemisphere. Ch. 10 In: Landscapes, Genomics and Transgenic Conifer Forests. Springer, Netherlands.



Examples of ongoing public research on genetic modification of trees can be found on the PRRI web site.

Because of the numerous and diverse potential benefits from GM trees, the PRRI believes that it is essential to not only maintain, but indeed to intensify, biotechnology research in trees to help address challenges in forestry. The participation of FSC certified industries is critical for this research to move forward in a careful, measured, and relevant manner.

With this introduction, we propose to replace element number 5 in your draft policy document with the following text:

“5. As many of the challenges in forestry cannot be solved by conventional techniques alone, research in this field also includes exploring biotechnology techniques of many kinds, including the use of GM trees. Biotechnology can contribute significantly to sustainable forestry, for example in that it may help overcome the long generation time, and other difficult breeding constraints that hamper the use of sexual crosses for introduction and testing of economically and environmentally important traits. As with any new technology, it is of course appropriate to also address any safety concerns that may arise from applications of modern biotechnology, and FSC will therefore not consent to any planting of genetically modified trees that has not been subject to adequate environmental risk assessment consistent with the Cartagena Protocol on Biosafety and that is not duly authorized by appropriate government authorities.”

Thank you very much for considering our views. Let us know if you wish further information in support of our statement. We are available to have an in depth debate with FSC on the potential benefits and the potential risks of genetically modified trees, and ways to assist Governments in making informed decisions in this field.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Montagu', written over a light blue horizontal line.

Em. Prof. Marc van Montagu

Chairman of the Steering Committee of the
Public Research and Regulation Initiative

Strauss, S.H., Coventry, P., Campbell, M.M., Pryor, S.N., and Burley, J. (2001). Certification of genetically modified forest plantations. *International Forestry Review*, 3(2) 85-102

Strauss, S.H., Campbell, M.M., Pryor, S.N., Coventry, P., and Burley, J. (2001). Plantation Certification and Genetic Engineering: FSCs ban on research is counterproductive. *J. For.*, 99(12) 4-7