

16 July 2019

Dear Director General/President/Council Member/Director

Genetic engineering of wild species and ecosystems

We write regarding the Genetic Frontiers for Conservation report, published on your website on 9th May 2019.

We note that the genetic engineering of wild species and their release into the environment is a significant step beyond the current applications of this technology (which is currently mainly used in GM crops in North and South America), since it involves a deliberate attempt to genetically engineer entire ecosystems, with consequences that are unpredictable and potentially irreversible.

We welcome your recognition of the need for a “balanced, fact-based debate around this important but controversial topic”. However, we note that the majority of the contributors to the Genetic Frontiers for Conservation report, including the chair of the taskforce and technical group, are well-known advocates of genetically engineering wild species and releasing them on a large scale into the environment, and that the key case studies were written by the proponents of these technologies.

We understand that the report was commissioned under Resolution 086 to inform a new IUCN policy on conservation and synthetic biology, which IUCN Members will vote on during the IUCN World Conservation Congress in June 2020. As such, the report provides an interesting but regrettably one-sided perspective, which is inadequate to inform your policy discussions and is out of step with the precautionary tone of Resolution 086. We respectfully suggest that you now move to commission an equal and equivalent report by those who advocate a precautionary approach which questions the wisdom of genetically engineering wild ecosystems in this way, thus bringing the assessment in line with Resolution 086. Until that is done, no policy should be formulated.

We are sending this letter to all Council members and making it public. We request that you also circulate it to all your Members to ensure that the debate about the potential use of these technologies is as inclusive as possible.

Yours sincerely,

Acción Ecológica  
Acción Ecológica, Ecuador  
Acción por la Biodiversidad, Argentina  
African Biodiversity Network (ABN)  
African Centre for Biodiversity  
Agrar Koordination  
Agrecol Association  
AgroEcology Fund  
Alaska Trollers Association  
Alliance for Food Sovereignty in Africa (AFSA)  
Alliance for Sustainable & Holistic Agriculture (ASHA)  
Alliance Suisse pour une agriculture sans génie génétique  
Alianza Hondureña frente al Cambio Climático AHCC- Honduras  
Andhra Pradesh Vyavasaya Vruthidarula Union-APVVU, India  
AP Agricultural Workers Union (APVVU)  
Arab Group for the Protection of Nature (APN)  
Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL) e.V.  
Asamblea de Pueblos del Sur, Ecuador  
Associação Brasileira de Agroecologia, Brasil  
Asociación Nacional para el Fomento de la Agricultura Ecológica ANAFAE-Honduras  
Association Ouest Africaine pour le Développement de la Pêche Artisanale (ADEPA)  
Bangladesh Environment Lawyers Association (BELA)

Bangladesh Food Safety Network  
Bangladesh Poribesh Andolon (BAPA) - The Environment movement in Bangladesh  
BARCIK Bangladesh  
Beyond GM  
Biodiversity and Biosafety Association of Kenya (BIBA Kenya).  
Biofuelwatch  
Biorespect  
Biowatch South Africa  
BUND Naturschutz in Bayern (BN; Friends of the Earth Bavaria)  
Bundesverband Naturkost Naturwaren e.V. (BNN)  
Canadian Biotechnology Action Network (CBAN)  
Caritas Dalat, Vietnam  
Caritas Zambia  
Center for Food Safety  
Center for Human Ecology Studies of Highlands  
Center for Indigenous Knowledge Research and Development (CIRD), Vietnam  
Center for Research and Documentation Chile-Latin America (FDCL)  
Centro Ecológico, Brasil  
Centro Internazionale Crocevia  
Chetana Society, India  
CIWF  
Citizen Consumer and Civic Action Group (CAG), Chennai  
CN Tunisie WMW  
Coalición Nacional de Redes y Organizaciones Ambientales CONROA- Honduras  
Coalition for the Protection of African Genetic Heritage (COPAGEN)  
Comité Ouest Africain de Semences Paysannes (COASP)  
Commons for EcoJustice  
Community Alliance for Global Justice/AGRA Watch  
Community Entrepreneur Development Institute (CENDI), Vietnam  
Community Knowledge Systems (CKS)  
Comparing and Supporting Endogenous Development (COMPAS) Africa  
Consumers' Association of Penang, Malaysia  
Consumers Union of Japan  
Corporate Europe Observatory  
CRIIGEN  
Critical Scientists Switzerland (CSS)  
Dachverband Kulturpflanzen- und Nutztiervielfalt e.V.  
Deutscher Naturschutzring (DNR) e.V.  
DIOBASS Platform in Kivu/DRCongo  
Eastern and Southern Africa Pastoralist Network (ESAPN)  
Eastern and Southern African Small Scale Farmers' Forum (ESAFF)  
EcoNexus  
ELTE Nature Conservation Club, Hungary  
ESAFF Lesotho  
ETC Group  
Ethiopian Society for Consumer Protection - ETHIOSCOP  
European Network of Scientists for Social and Environmental Responsibility (ENSSER)  
FAHAMU  
Fahamu Africa  
FAITH ACTION NETWORK  
Fambidzanai Permaculture Centre  
Farm-Saved Seeds Network (FASSNET)  
Federación Costarricense para la Conservación del Ambiente, FECON  
Fédération Agroécologique du Bénin (FAEB), Cotonou - Bénin  
Fellowship of Christian Councils and Churches in West Africa (FECCIWA)  
FENEV/RDC  
FIAN International  
Florida Keys Environmental Coalition  
Fonds für Kulturpflanzen-Entwicklung  
Food Sovereignty Ghana  
Forest & Bird (the Royal Forest & Bird Protection Society of New Zealand)  
Forum Environment & Development (Forum Umwelt und Entwicklung)  
Freie Saaten e.V.  
Frie Bønder Levende Land, La Via Campesina Denmark

Friends of the Earth Australia  
Friends of the Earth–Africa  
Friends of the Earth-Ghana  
Friends of the Earth International  
Friends of the Earth USA  
GE Free NZ in Food and Environment  
Gen Au-Rheinau  
GENE CAMPAIGN, INDIA  
Gene Ethics  
Gen-ethische Netzwerk e.V. Berlin, Germany  
GeneWatch UK  
Getreidezüchtung Peter Kunz (gzpk)  
Global Justice Ecology Project  
Global Justice Now!  
Global Youth Biodiversity Network  
GLOBAL 2000 - Friends of the Earth Austria  
GM Freeze  
GMWatch  
GRAIN  
Greenpeace  
Groundswell West Africa (GWA)  
Growth Partners Africa -GPA  
Grupo Semillas, Colombia  
Health of Mother Earth Foundation (HOMEF)  
Hope for Rural Women Assembly  
HORTUS OFFICINARUM  
IFOAM - Organics International  
Initiative for GE-free seeds and breeding (IG Saatgut)  
INKOTA-netzwerk e.V.  
Institute for Agriculture and Trade Policy  
Initiative for GE-free seeds and breeding (IG Saatgut)  
International Center for Technology Assessment  
Indigenous Peoples of Africa Coordinating Committee (IPACC)  
Institut Africain pour le Développement Economique et Social (INADES-Formation)  
Institut Panafricain pour la Citoyenneté, les Consommateurs et le Développement (CICODEV Africa)  
Instituto de Estudios Ecologistas, Ecuador  
International Tree Foundation  
Jeunes Volontaires pour l'Environnement (JVE) International  
JINUKUN (Réseau national pour une gestion durable des ressources génétiques)  
Justica Ambiental - Friends of the Earth Mozambique  
Justice Pesticides  
Kasisi Agricultural Training Center  
Kenya Agricultural Policy Network -KAPN.  
Kenya Food Rights Alliance-KFRA  
Kikandwa Environmental Association Mityana District, Uganda  
Kleinbauern-Vereinigung VKMB  
La Via Campesina Africa  
La Via Campesina Southern and Eastern Africa  
Les Amis de la Terre-Togo  
Livelihood Sovereignty (LISO)  
Logos Environmental  
MASIPAG, Philippines  
Movimento Ciência Cidadã, Brasil  
NABU e.V.  
Nammazhvar ecological agriculture research and training centre  
National Agricultural Workers Forum (NAWF)  
National Centre for Labour (NCL)  
National Family Farm Coalition  
Nayakrishi Andolon Bangladesh  
Network of Farmers' and Agricultural Producers' Organizations of West Africa (ROPPA)  
NeverEndingFood  
NOAH - Friends of the Earth Denmark  
North American Marine Alliance  
Northeast Organic Farming Association Interstate Council

Oficina de Derechos de la Naturaleza, Ecuador  
OGM dangers  
Organic Consumers Association  
Organic Farmers Market, Chennai  
Organisation Beninoise pour la Promotion de l'Agriculture Biologique (OBEPAB)  
Organización de Mujeres Campesinas e Indígenas CONAMURI - Paraguay  
PAN Africa  
Participatory Ecological Land Use Management (PELUM) Association  
Participatory Ecological Land Use Management (PELUM) Zimbabwe  
Pastoralist Forum Ethiopia (PFE)  
PELUM Kenya  
PELUM Swaziland  
People's Coalition on Food Sovereignty (PCFS)  
People's Coalition on Food Sovereignty (PCFS)-Africa  
People's Coalition on Food Sovereignty (PCFS)-Europe  
Pesticide Action Network North America  
Physicians and Scientists for Global Responsibility New Zealand Charitable Trust (PSGR NZ)  
Plate forme Sous Régionale des Organisations Paysannes d'Afrique Centrale (PROPAC)  
PLANT (Partners for the Land & Agricultural Needs of Traditional Peoples)  
Pomologen-Verein  
Practical Action  
Pro Natura-Friends of the Earth Switzerland  
Rainman Landcare Foundation and Biological Systems Laboratory  
Red Agroecologica Loja, Ecuador  
Red de Coordinación en Biodiversidad, Costa Rica  
Red de Ecologistas Populares, Ecuador  
Red Nacional de Agricultura Familiar - RENAF Colombia  
Red por una América Latina Libre de Transgénicos, Ecuador  
Regeneration International  
Regional Schools and Colleges Permaculture Programme (ReSCOPE)  
Réseau Africain pour le Droit à l'Alimentation (RAPDA –Togo)  
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Sahabat Alam Malaysia/Friends of the Earth Malaysia  
Salva la Selva, Spain  
Save Our Seeds (SOS)  
Schweizer Allianz Gentechfrei (SAG)  
Sciences Citoyennes  
Scientists for Global Responsibility  
Seed Savers Network, Kenya  
Slow Food Deutschland  
Social Policy Ecology Research Institute (SPERI), Vietnam  
Society for International Development (SID)  
STOP Genetically Engineered Trees  
Stop Golden Rice Network  
Sustainability Council of New Zealand  
Swift Foundation  
SWISSAID  
TABIO  
Tamil Nadu green movement  
Tamil Nadu organic farmers federation  
TCOE  
Telangana Agricultural Workers Union (TVVU)  
TERRE A VIE  
Testbiotech  
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Thamizhaga Vivasayegal Sangam, Erode  
Thanal  
Tharcharbu Iyakkam, Sirkali  
The Bioscience Resource Project

The Faith and Justice Network of the Mano River Basin Countries of West Africa  
The Gaia Foundation  
Third World Network  
Thousand Currents (formerly IDEX)  
Ubinig  
UCCSNAL  
Uganda Coalition for Sustainable Development  
Union Africaine des Consommateurs (UAC)  
Vanagam  
Via Organica  
Washington Biotechnology Action Council  
We are the Solution (WAS)  
World Neighbours  
Zambia Alliance for Agroecology and Biodiversity  
ZIMSOFF  
Zukunft säen!  
Zukunftsstiftung Landwirtschaft

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