

**GOVERNMENT RESPONSE TO THE REVIEW OF THE
AGRICULTURE AND ENVIRONMENT
BIOTECHNOLOGY COMMISSION**

**Department of Trade and Industry
Department for Environment, Food and Rural Affairs
Scottish Executive
National Assembly for Wales
Department of the Environment and
Department of Agriculture & Rural Development in Northern Ireland**

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1. Summary

1. The Government¹ set out its primary conclusions in relation to the review of the AEBC in the letter from the Secretaries of State for Trade and Industry and Environment, Food and Rural Affairs of 17 March 2005 (Annex E). We indicated in that letter how much we value the excellent work that the AEBC has done. It was given a challenging remit at a time of deep controversy and polarisation of views over GM. The policy on and regulation of biotechnology, and specifically genetically modified organisms, has moved on considerably since the AEBC was set up in 2000. The Government has established its policy on the commercial growing of GM crops, informed by the AEBC's reports, and there is no commercial cultivation expected in the UK before at least 2008.

2. We are grateful for the letter of 18 January from the Chair of the AEBC which summarised Commission Members' reaction to the Review report and their thoughts on the future. The letter also defined the legacy of the AEBC as including aspects of ways of working, particularly: independence, openness, transparency, public engagement, reporting lines to Government, and in general learning lessons from the AEBC experience. We agree with these reflections, and the need to ensure that Government draws on the experience of the AEBC. Our response aims to do this. We would welcome further discussion with the former members of AEBC, affected bodies and interested parties, on the proposals set out in this response and other action that could be taken to ensure that we effectively enshrine the legacy of the AEBC.

3. As set out in our letter of 17th March, Government accepts the two main recommendations of the first independent organisational and performance review of the AEBC **that the AEBC is wound up once it has completed its existing work on research agendas and non-food crops**. The majority of those consulted during the Review, whilst recognising the significant contribution of the AEBC over the last five years, doubted the case for maintaining the operation of the Commission with its present terms of reference and felt that it had largely discharged its original remit. Some felt there was a need for an AEBC-like body with wider terms of reference covering strategic issues in relation to the future of agriculture and the environment more generally. But the Reviewer reached no conclusion on this, as it was outside his terms of reference.

¹ This response by the UK Government and Administrations in Scotland, Wales and Northern Ireland reflects the collective views of sponsoring Ministers on the review of the AEBC.

4. **We value the work that the AEBC has done and agree that it has largely discharged its original remit. Given that the AEBC has given comprehensive advice on coexistence of GM and non-GM crops, and there is no immediate prospect of GM crops being grown commercially in the UK, there are no obvious outstanding key issues that the Commission might address in the near future. We therefore accept that it should be wound up. We also agree that the AEBC should complete its existing work programme before it is wound up, and we request that it does this by 30 April 2005, a date that the AEBC has indicated it agrees with.**

5. The Government is committed to sustaining the AEBC legacy. Many of the AEBC's characteristics - its broad-based approach, its challenge function, its openness and its engagement with the public - have increasingly been built in to the ways of working of Government in general and to the work of our other strategic advisory Non-Departmental Public Bodies (NDPBs) in recent years, although it has set a high standard to follow in a challenging area. We have moved away from over-reliance on a simplistic approach to 'the public understanding of science' towards a two-way engagement and dialogue aimed at promoting improved mutual understanding between scientists, science policy makers, the general public and policy makers. Facilitated by the Sciencewise programme, we are now focusing on early (upstream) dialogue on the health, safety, environmental, ethical and social implications of new science and technologies, including biotechnology. We wish to maintain this shift of approach, and to work with existing bodies to help us to achieve this.

6. In making this decision the Government accepts that developments in biotechnology and genetic modification are still of concern to stakeholders and the public and we will ensure that comprehensive strategic advice is still available when needed. **The Government believes that in relation to existing areas of concern existing bodies can between them take forward the AEBC legacy, in terms of encompassing the biotechnology aspects and meeting the need for broader integration of biotechnology issues with wider agriculture and environment considerations.** We do not feel there is currently a need at present for a new strategic body covering AEBC issues alone. We need to continue to anticipate and monitor developments, for example through our horizon scanning work, in order to identify possible future requirement for strategic advice and stakeholder and public engagement and we do not rule out the need for some new broader body in the future.

7. There are three main strands of advice on biotechnology to be taken forward relating to: sustainable agriculture and environment, scientific issues and horizon scanning. These strands are matched by four UK-wide, strategic advisory bodies of particular relevance:

- **The Sustainable Development Commission (SDC)** is a UK wide body giving strategic advice on all aspects of sustainable development. The SDC held an initial discussion on 15 March on the issues raised by

the independent review of the AEBC, and whether there was a role that they could play in this work. We note their conclusion that a new role would need to be accompanied by additional resources. We are not convinced that this agenda should be a priority for SDC's future work programme – unless the SDC wishes it to be. We are keen however to engage the SDC in ensuring that Government learns lessons and internalises the legacy of the AEBC. We therefore invite the SDC to provide further advice to Government on the proposals made here to enshrine the legacy of the AEBC and the issues that it has raised, including how we can best meet our commitment to early upstream dialogue.

- **The Centre of Excellence in Science and Technology Horizon Scanning**, within the Office of Science and Technology (OST), will provide the strategic context to horizon scanning activity in Government Departments. The Horizon Scanning Centre will work with stakeholders such as those identified here to identify issues which require wider consideration, and bring these issues to the attention of Government.
- **The Royal Commission on Environmental Pollution (RCEP)** is an independent, UK-wide standing body established in 1970 to advise the Queen, the Government, Parliament and the public on environmental issues. RCEP has in the past advised on the regulatory framework for biotechnology and risk assessment and is willing to engage in and advise on any new issues that might arise.
- **The Advisory Committee on Releases to the Environment (ACRE)**, which provides independent statutory advice on GM safety issues, any science-based GM matter and the regulatory framework. ACRE members have wide ranging expertise and can advise on the implications of developments in any area of genetic modification including micro-organisms, plants and animals.

Together, these bodies embrace many of the key characteristics of the AEBC, including independence, broad membership, public engagement and addressing social and ethical issues.

8. In addition the Government can rely on existing specialist bodies, such as the Farm Animal Welfare Council (FAWC), the Companion Animal Welfare Council (CAWC) and the Advisory Committee on Pesticides (ACP) for advice on specific issues.

9. AEBC has highlighted the role of biotechnology in sustainable agriculture as a specific area for further development. We strongly share this view. Sustainable agriculture is central to the Government's policy towards farming. There is a variety of ways in which the Government receives advice and guidance on agricultural policy. In Scotland, sustainable development has been considered in the context of work on the implementation of the Agriculture Strategy, under the advice of the Agriculture Strategy

Implementation Group (ASIG) and the recently reformed body the Agriculture Strategy Group (ASG). Sustainable Agriculture in Wales is being progressed in the context of the Farming for the Future strategy, aimed at helping secure a viable future for farming in Wales that is sustainable economically, environmentally and socially. And in Northern Ireland the Department of Agriculture and Rural Development has elected to make sustainable agriculture a cross-cutting theme across its full range of activities.

10. Whilst this advice is much valued and very important the UK Government shares the view of the AEBC and others that the environmental impacts of conventional agricultural needs further careful consideration. With this in mind the Government is seeking to do two things. First, to draw together the different sources of advice on these issues. Second, to ensure that it is coming from as independent a source as possible. We will build on the work of existing bodies such as the Defra Sustainable Farming and Food Research Priorities group to establish a new sustainable agricultural advisory group. We would welcome advice from the SDC and others on the detailed terms of reference of such a group, which will be explicitly required to look across the range of policy, research and other activity in this area and offer independent advice directly to the Secretary of State for the Department of the Environment, Food and Rural Affairs.

11. Government recognises the importance of looking forward, to identify issues that may arise as a result of new science and its applications and in the ten-year investment framework for science and innovation we announced the formation of a new OST Horizon Scanning Centre. This Centre, which has now begun its operations, will provide the strategic context of horizon scanning activity in the Government Departments such as the work of the Defra Sustainable Farming and Food Research Priorities Group. In addition the Science Advisory Council (SAC), provides Defra's Chief Scientific Adviser and Ministers with expert and independent strategic advice on science policy and strategy.

12. **The Reviewer's third and final recommendation was to invite the AEBC *'to prepare a paper on the issues raised by, and options for, engagement with the public on the introduction of new technologies before it disbands'*.**

13. **We would value the AEBC's views on these issues, and note that the Commission is intending to produce a short report addressing this recommendation.** This can feed into future editions of relevant Government guidance and codes of practice.

14. **In addition to his three recommendations, the Reviewer made several suggestions for *'lessons that might be drawn relevant to future advisory bodies whose remit includes addressing issues of public confidence in emerging technologies'*.** The Government is grateful for these sensible suggestions and broadly agrees with them.

2. The Review's Recommendations on the Future of the AEBC

15. In his Report² on the AEBC³ the independent reviewer, Dr Neil Williams, considered a number of organisational and performance issues and the future operation of the Commission, before making the following three recommendations⁴, that:

'(i) The AEBC is wound up by the end of the current financial year (recommendation 1, paragraph 8.12).

'(ii) The AEBC is asked to complete its existing work on research agendas and non-food crops by that date (recommendation 2, paragraph 8.15).

'(iii) The AEBC is invited to prepare a paper on the issues raised by, and options for, engagement with the public on the introduction of new technologies before it disbands (recommendation 3, paragraph 8.17).'

16. The Reviewer found that a clear majority of those consulted, whilst recognising the significant contribution of the AEBC over the last five years, *'doubted the case for maintaining the operation of AEBC with its present terms of reference.'* And that *'A significant number of respondents believed that there was a need for a body akin to AEBC but with wider terms of reference. They were divided, however, on whether that body should be the AEBC.'* He concluded that if there were to be such a body it should not be a continuation of the AEBC. He reached no conclusion on the need for a new advisory body, with different terms of reference and membership concerned with strategic issues in relation to the future of agriculture and the environment more generally, as this raised issues outside his terms of reference.

17. Finally, the Reviewer made several suggestions for *'lessons that might be drawn relevant to future advisory bodies whose remit includes addressing issues of public confidence in emerging technologies'*. These lessons, and the third recommendation above, are considered in Section 3.2. Annex A provides a short summary of the review process.

18. Government has already accepted the first two recommendations of the Review (See Annex E). We value the work that the AEBC has done and agree with the view of the Reviewer that it has largely discharged its original remit. Given that the AEBC has given comprehensive advice on coexistence of GM and non-GM crops, and there is no immediate prospect of GM crops being grown commercially in the UK, there are no obvious outstanding key issues that the Commission might address in

² Published on 2 December 2004 and available on the OST website at: www.ost.gov.uk/policy/bodies/review.html

³ Further information about the AEBC can be found on its website at: <http://www.aebc.gov.uk/>

⁴ Pages 8 & 35-38 of the Review report.

the near future. We therefore accept that it should be wound up. We also agree that the AEBC should complete its existing work programme before it is wound up, but we request that it does this by 30 April 2005. It is important that maximum value is obtained from the current work before it is concluded and this date, which is slightly later than that recommended by the Reviewer, is one that AEBC Members themselves feel will enable them to achieve this.

19. We would like to reiterate our thanks and support for the work that the AEBC has carried out since its creation. The Commission is held in high regard by Government and has done an excellent job. We also acknowledge the key contribution of its chairman, Professor Malcolm Grant, and deputy chair, Julie Hill, the dedication and hard work of its present and former members, and the work of its Secretariat.

20. Almost all of those consulted by the Reviewer agreed that the AEBC had been set a very challenging, and to some extent experimental, remit. It was formed in June 2000 at a time of deep controversy and polarisation of views over GM and following a review of the advisory and regulatory framework for biotechnology (see Annex B). The Reviewer also points out that it faced a lack of initial trust, both among members and between Government and members, and deep disagreements over the intellectual framework for debate.

21. Over the past four and a half years, the AEBC has explored a number of controversial issues associated with strongly polarised views in an open and transparent manner and gone to great lengths, at times involving painstaking negotiation, to reach a consensus view. It has produced three major reports on GM crops and the Farm Scale Evaluations of GM herbicide-tolerant crops⁵, GM animals⁶, and coexistence and liability in relation to GM crops⁷, and its advice informed the Government's GM policy statements in March 2004. The GM public debate was set up in 2002 as a result of the recommendations made in the AEBC's '*Crops on Trial*' report. The animals report concluded that GM and cloned animals should be part of the same regulatory system as other animals wherever possible. We have accepted the broad thrust of the AEBC's recommendations on co-existence and liability and are intending to undertake a formal consultation on a number of these issues later in 2005. The policy context for much of the work of the AEBC is summarised in Annex C.

22. Government values the reports that the AEBC has produced and its significant input to strategic thinking on biotechnology in agriculture. We look forward to receiving the final reports on agricultural biotechnology research agendas and non-food crops and biotechnology.

⁵ '*Crops on Trial*', September 2001, AEBC. <http://www2.aebc.gov.uk/aebc/pdf/crops.pdf>

⁶ '*Animals and Biotechnology*', September 2002, AEBC. http://www2.aebc.gov.uk/aebc/pdf/animals_and_biotechnology_report.pdf

⁷ '*GM crops? Coexistence and Liability*', November 2003, AEBC. http://www2.aebc.gov.uk/aebc/reports/coexistence_liability.shtml

23. Government agrees with the arguments in the Review report on which the first recommendation is based. The AEBC was established for a particular time and in a unique political climate. By and large it has discharged its original remit and in the different circumstances of today, we agree that its legacy should be continued through other bodies. A clear majority of those consulted during the Review doubted the case for maintaining the AEBC with its present terms of reference and the Reviewer felt *'it is likely to face increasing difficulty in finding areas within its current terms of reference on which it can make a distinctive contribution'*. We feel that, in the near future at least, there would be little of strategic significance for the Commission to consider. The policy on and regulation of biotechnology, and specifically genetically modified organisms (GMOs), has moved on considerably since the AEBC was set up in 2000, at a time of deep controversy over GM. Since then, the legal framework has been significantly strengthened with a completely new EU regime (see Annex C). Government has established its policy on the commercial growing of GM crops, informed by the AEBC's reports, and there is no commercial cultivation expected in the UK before 2008 at the earliest.

24. The Review report also reflected an emerging view that strategic GM, animal and crop issues might in future be best considered as part of the wider issues of sustainable agriculture and the environment, but it was felt that this would not best be done through continuation of the AEBC. The relevant components of the advisory and regulatory framework post-AEBC are considered in the next Section.

25. We note that when the AEBC met on 9 December 2004 and discussed the Reviewer's report, no Member disagreed with his recommendations to wind the Commission up after completing the current work programme. We are grateful for Professor Malcolm Grant's subsequent letter to us of 18 January 2005⁸, summarising Commission members' reaction to the Review report and their thoughts on the future. This reiterates Members' acceptance of the Reviewer's main recommendation.

3. Post-AEBC Arrangements

3.1 The advisory and regulatory framework

26. We note the strong view of the Chair and AEBC members (in Professor Malcolm Grant's letter and from their December 2004 meeting) that the legacy of the AEBC should be sustained in some way by another body or bodies after its end. This legacy is defined by the AEBC as including:

- the need to continue to consider biotechnology strategically (and possibly the need for agriculture as a whole to be considered more strategically);

⁸ Available on the AEBC website at:
http://www.aebc.gov.uk/aebc/reports/members_response_aebc_review.pdf

- the breadth of membership and the ability to consider social, ethical and other aspects of issues; and
- aspects of ways of working, particularly: independence, openness, transparency, public engagement, reporting lines to Government, and in general learning lessons from the AEBC experience.

27. Many characteristics of the AEBC - its broad-based approach, its openness and its engagement with the public - are increasingly built in to the ways of working of Government in general and to the work of other strategic advisory NDPBs, although it has set a high standard to follow in a challenging area. In February 2000, just before the AEBC's establishment, the House of Lords Select Committee on Science and Technology published its seminal 'Science and Society' report⁹. This set out clearly the need to move away from the one-way communication which characterised 'the public understanding of science' towards a two-way engagement and dialogue aimed at promoting improved mutual understanding between scientists, science policy makers and the general public. Engagement has strongly characterised the work of the AEBC and this approach now forms part of our Science and Society agenda, which we are committed to delivering. This was reiterated in last year's ten-year investment framework for science and innovation.

28. As in the Government's recent response to the Royal Society and Royal Academy of Engineering report on nanoscience and nanotechnologies¹⁰, the focus is now on encouraging early, 'upstream' dialogue on the ethical, health, safety and environmental implications of new science and technologies. We are also strengthening our ability to carry out horizon scanning for new and emerging science and technology capabilities, and to engage with a wider range of stakeholders in exploring their potential implications. The new 'Sciencewise' grants scheme will build the capacity of citizens, the science community and policy makers to engage in the dialogue necessary to establish and maintain public confidence in making better choices about critical new areas in science and technology. In addition, Government is considering how to respond to recent advice from the Council for Science and Technology, the UK Government's top-level advisory body, on how Government could make better use of public dialogue to inform the development of science and technology policies.¹¹

29. Government believes that the remits of relevant existing bodies can encompass biotechnology aspects without the need, at the present time, for a new strategic body covering AEBC issues alone. There was an emerging consensus from the Review that in future the role of the AEBC and consideration of biotechnology would be best undertaken as an integral part

⁹ The 'Science and Society' report is available at: <http://www.publications.parliament.uk/pa/ld199900/ldselect/ldsctech/38/3801.htm> and the Government's response at: <http://www.dti.gov.uk/scienceind/report3response.htm>

¹⁰ http://www.ost.gov.uk/policy/issues/nanotech_final.pdf

¹¹ 'Policy through dialogue: informing policies based on science and technology', 2005, Council for Science and Technology. Available from: www.cst.gov.uk

of the wider consideration of the future of agriculture and the environment. Such a role goes beyond the current terms of reference of the AEBC and forms part of the role of several of the existing advisory bodies that will take forward the AEBC legacy in terms of its remit. We accept that developments in biotechnology and genetic modification are still of concern to stakeholders and the public and we will ensure that comprehensive strategic advice is still available when needed. We need to continue to anticipate and monitor developments, for example through our horizon scanning work, in order to identify possible future requirements for strategic advice and stakeholder and public engagement and we do not rule out the need for some new broader body in the future.

30. Between them, existing bodies will take forward the AEBC legacy and take account of the need for broader integration of biotechnology issues with wider agriculture and environment considerations. We consider that there are three main strands of advice which need to be taken forward: sustainable agriculture and environment, scientific issues and horizon scanning. These strands are matched by four UK-wide strategic advisory bodies of particular relevance: the Sustainable Development Commission (SDC), the Royal Commission on Environmental Pollution (RCEP), the Advisory Committee on Releases to the Environment (ACRE) and the Centre of Excellence in Science and Technology Horizon Scanning. Further details of these and other bodies are given below and in Annex D.

Sustainable agriculture and environment

31. The challenge of sustainable agriculture is central to the UK Government's policy towards strategy for food and farming. Over 70 percent of our land is farmed so the environmental impact of farming, both positive and negative, has a massive effect on the quality of our landscape and the diversity of our wildlife. From recent reforms of the Common Agricultural Policy to our new multi million pound environmental stewardship scheme the Government has, working closely with the industry, put this approach into practice.

32. There is a variety of ways in which the UK Government receives advice and guidance on agricultural policy. Defra is actively taking forward sustainable development in England, in response to the Curry Commission Report¹², through its independent Sustainable Farming and Food Implementation Group¹³. One particular area of activity overseen by the Implementation Group is the New Markets and New Technologies workstream, which includes biotechnology. This aims to make a substantial contribution to the sustainability of agriculture, by supporting diversification through the development of new markets for non-food crops and new technologies.

¹² The Policy Commission on the Future of Farming and Food, chaired by Sir Don Curry, which reported in January 2002. <http://archive.cabinetoffice.gov.uk/farming/index/commissionreport.htm>

¹³ <http://www.defra.gov.uk/farm/sustain/implement/>

33. Whilst this advice is much valued and very important the UK Government shares the view of the AEBC and others that the environmental impacts of conventional agricultural needs further careful consideration. With this in mind the UK Government is seeking to do two things. First, to draw together the different sources of advice on these issues. Second, to ensure that it is coming from as independent a source as possible. We will build on the work of existing bodies such as Defra's Sustainable Farming and Food Research Priorities Group to establish a new sustainable agriculture advisory group. We would welcome advice from the SDC and others on the detailed terms of reference of such a group, which will be explicitly required to look across the range of policy, research and other activity in this area and offer independent advice directly to the Secretary of State.

34. In Scotland, sustainable development has been considered in the context of work on the implementation of the Agriculture Strategy¹⁴, under the advice of the Agriculture Strategy Implementation Group¹⁵ (ASIG). This work is now being given fresh momentum as the Minister for Environment and Rural Development has announced his intention to review and refresh the Agriculture Strategy. A new Agriculture Strategy Group (ASG) held its first meeting on 8 March 2005 to agree a new agenda, which includes the further development of environmental sustainability within agriculture as one of its key themes.

35. Sustainable agriculture in Wales is being progressed in the context of the Farming for the Future strategy, aimed at helping secure a viable future for farming in Wales that is sustainable economically, environmentally and socially. Developed with guidance from an Advisory group drawn from experts from academic and farming backgrounds, the strategy contains 52 action points that the Welsh Assembly Government working with partner organisations is taking forward to help create a framework to facilitate and support change. The strategy was launched in November 2001 and its progress is being reviewed annually.

36. In Northern Ireland the approach is slightly different. Instead of setting up a dedicated implementation group, the Department of Agriculture and Rural Development (DARD) has elected to make sustainable agriculture a cross-cutting theme across its full range of activities. DARD's corporate strategy includes sustainability targets for all its work divisions, and these are monitored closely to ensure that they are delivered as planned. The Department takes its responsibilities for sustainable agriculture seriously, not least because there is no equivalent to the Curry report, which did not include the Province.

37. There are a number of bodies that provide advice on agriculture and environment issues. The SDC is a UK-wide body giving strategic advice on all aspects of sustainable development. It decides its own work programme and reports to the Prime Minister and the First Ministers of the Devolved Administrations. Like the AEBC, its members are drawn from a wide range of

¹⁴ <http://www.scotland.gov.uk/library3/agri/fssa-00.asp>

¹⁵ <http://www.scotland.gov.uk/Topics/Agriculture/Agricultural-Policy/17289/8016>

experience and expertise and it decides its own work programme. The Commission regularly invites people to work with it in shaping advice and programmes, for example via discussion fora, facilitated workshops, electronic roundtables, seminars, and e-bulletins. The SDC has already held opening discussions regarding the possibility of taking on responsibility for providing strategic advice on sustainable agriculture biotechnology issues.

38. RCEP is an independent, UK-wide standing body established in 1970 to advise the Queen, the Government, Parliament and the public on environmental issues. Its remit is to advise on matters, both national and international, concerning the pollution of the environment; on the adequacy of research in this field; and on the future possibilities of danger to the environment. Within this remit, where 'pollution' is interpreted broadly, it has the freedom to consider and advise on any matter it chooses. It considers the economic, ethical and social aspects of an issue as well as the scientific and technological aspects, including biotechnology if relevant, and it consults widely. The RCEP has addressed biotechnology in the past, with its Thirteenth Report in 1989 on The Release of Genetically Engineered Organisms to the Environment. Members are drawn from a variety of backgrounds contributing a wide range of expertise and experience in science, medicine, engineering, law, economics and business.

Science and the safety and impact of GMOs

39. Science, and the use of science to assess the safety and environmental impact of genetically modified organisms (GMOs), play an important part in the consideration of biotechnology issues. The UK Government and the Devolved Administrations are advised on these matters by the independent Advisory Committee on Releases to the Environment (ACRE). ACRE's responsibilities include statutory advice on GM safety issues, any science based GM matter and the regulatory framework. One of the suggestions made by some members of the AEBC, in their response to the Review, is that science and scientists should play a bigger part in any future body. Government believes that ACRE, with its membership of leading scientists, is well placed to do this. The GM Science Review emphasised the need for regulatory evaluation to keep pace with the challenges posed by developments in GM technology. ACRE is also well placed to do this. It holds open meetings on specific strategic issues and will continue this programme.

40. The Science Advisory Council (SAC), provides Defra's Chief Scientific Adviser and Ministers with expert and independent strategic advice on science policy and strategy. It helps to ensure the quality and appropriateness of Defra's various scientific activities and use of science, by providing strategic advice on all its science activities and their relationship with both Defra's policy goals and the wider UK and international science base and horizons. SAC members have a breadth of relevant scientific knowledge, including the social sciences, and there is also a non-scientist lay member.

41. The Scottish Executive's Environment and Rural Affairs Department (SEERAD) is intending to establish a Strategic Advisory Panel, one of whose

functions will be to provide independent advice on the strategic development of the Department's research programme. In Northern Ireland, the Science Service in the Department of Agriculture and Rural Development's (DARD's) strategy and programmes will in future be subject to more targeted stakeholder input, most notably via an Independent Expert Advisory Board (IEAB) that is to be established. The National Assembly for Wales does not have a separate agricultural research budget.

Horizon scanning

42. Government recognises the importance of looking forward, to identify issues that may arise as a result of new science and its applications. In the ten-year investment framework for science and innovation we announced the formation of a new OST Horizon Scanning Centre. This Centre, which is based in the Office of Science and Technology (OST) and builds on the work of the existing Foresight programme, has now begun its operations. It will provide the strategic context to horizon scanning activity in Government departments and elsewhere and inform Government's strategy for public engagement with science. Investigations will encompass all evidence streams, including economics, social sciences, ethical concerns and public opinions. It has a UK-wide remit and will engage with a wide range of stakeholders to provide input and to test outputs.

43. The Sustainable Farming and Food Research Priorities Group (RPG) is part of the New Markets and New Technologies workstream mentioned in paragraph 28. It aims to provide an independent and open source of advice to Defra on the strategic priorities for publicly funded research in support of sustainable farming and food industries in the UK. Its first report was published on 22 March 2005. In Scotland, SEERAD will look to its new Strategic Advisory Panel for advice on how to take forward horizon scanning activities.

44. We have taken steps to further strengthen the UK research base. Over the next three years, funding for the Biotechnology and Biological Sciences Research Council will rise by 33% to over £1 billion and funding of the Economic and Social Research Council will increase by 43% as a result of the new science spending allocations that were announced on 7 March 2005.

Other issues

45. In relation to other specific areas currently included in the AEBC remit (e.g. GM animals and non-food crops), there are a number of existing advisory bodies that considered biotechnology issues within their wider remits and that will be asked to advise as and when required (see Annex D).

46. A suggestion that was made by the AEBC at its December 2004 meeting that its legacy could also be sustained by the recruitment of one or more AEBC members to bodies taking on aspects of its remit in future. Whilst Government can not oblige individuals to serve on advisory bodies or require independent bodies to appoint specific individuals, we are pleased that this

suggestion has to some extent already been taken up. For example, current AEBC members are members of SDC and SAC. We fully appreciate the major contribution that members of our advisory bodies make and would certainly encourage AEBC members to bring their valuable expertise and experience to other Government bodies in the future.

3.2 General lessons for the future work of advisory bodies

47. **The Reviewer's third and final recommendation was to invite the AEBC 'to prepare a paper on the issues raised by, and options for, engagement with the public on the introduction of new technologies before it disbands'.**

48. **We would value the AEBC's views on these issues.** Government has stated that it is crucial to develop new approaches to bringing science and society together in constructive dialogue, to explore both aspirations and concerns related to shaping the development of new technologies.

49. We note that the Commission addressed the Reviewer's third recommendation at its meeting on 21 March, by conducting a workshop discussion among Members about their experiences over the past years, including with public engagement activities. This discussion will result in a short independent report for the benefit of other bodies and which can feed into future editions of relevant Government guidance and codes of practice (see below).

50. In addition to his three recommendations, Dr Neil Williams made several suggestions for '*lessons that might be drawn relevant to future advisory bodies whose remit includes addressing issues of public confidence in emerging technologies*'. The suggestions were:

(i) The terms of reference spell out clearly the role and purpose of the body, making clear how far it is to be an investigative/analytic body and how far a stakeholder consultation/consensus forming body (paragraph 9.2).

(ii) For stakeholder consultation/consensus forming bodies, consideration is given to a phased approach to projects designed to separate clarification of points in dispute from subsequent attempts to reach consensus (paragraph 9.3).

(iii) Emphasis is placed on the need for effective forward planning, incorporating mechanisms by which sponsoring Departments identify issues on which they would particularly welcome advice and on which they expect to need to make decisions within particular timeframes (paragraph 9.4).

(iv) The nature of the body's independence and its relationship to UK Government Departments and Devolved Administrations is set out in a hierarchy of documents including a Framework Document

setting out the responsibilities of the sponsoring Departments to the advisory body and the responsibilities of the advisory body to its sponsoring Departments (paragraph 9.5).

(v) Where this will improve efficiency of operation, reports should initially be drafted by small autonomous sub-groups, with a covering section from the body as a whole endorsing the recommendations and conclusions or explaining the differences between members that prevented such endorsement (paragraph 9.6).

51. **Government is grateful for these sensible suggestions and broadly agrees with them.** As the Reviewer points out, the appropriateness of the suggestions will depend on the nature and circumstances of the body, i.e. they are good practice statements for particular circumstances. Some are relevant to NDPBs in general, but the last suggestion would be a matter for individual bodies to decide on.

52. The first suggestion relates to the view of the Reviewer *‘that there is an inherent tension in an advisory body that is supposed to be both an investigative/analytic body and a stakeholder consultation/consensus forming body’* and that a hybrid body such as the AEBC could result in conflicting requirements on its members. Professor Malcolm Grant mentioned in his recent letter to us that some AEBC members had queried this view and felt that it was possible to balance both roles, and that the coexistence and liability report had achieved this. We feel that one body should be capable of adopting both of these roles to varying degrees. This may present particular challenges and tensions in the achievement of its objectives and to minimise these we concur with the Reviewer’s suggestion that, in this context, the role and purpose of the body are clearly defined (both generally and for specific activities).

53. Government will ensure that these suggestions are considered when the relevant codes of practice and guidance are next revised. Of most relevance is the Code of Practice for Scientific Advisory Committees¹⁶, which the AEBC follows. The need to revise this code of practice will be considered in 2005, once the present review of ‘Guidelines 2000: Scientific Advice and Policy Making’¹⁷ has been completed.

**Department of Trade and Industry
Department for Environment, Food and Rural Affairs
Scottish Executive
National Assembly for Wales
Department of Environment and Department of Agriculture & Rural Development in Northern Ireland**

¹⁶ ‘Code of Practice for Scientific Advisory Committees’, December 2001, OST.
<http://www.ost.gov.uk/policy/advice/copsac/index.htm>

¹⁷ ‘Guidelines 2000: Scientific Advice and Policy making’, July 2000, OST.
http://www.ost.gov.uk/policy/advice/guidelines_2000/index.htm

April 2005

The Review Process

1. It is a normal requirement to periodically review NDPBs to establish whether they continue to be the best way to deliver relevant services. On 27 May 2004 Government announced the first organisational and performance review of the AEBC, which was created in June 2000. Dr Neil Williams was appointed to conduct this independent Review, in-line with the relevant Cabinet Office guidance¹⁸. A Review Committee was established to ensure due process. The membership of this comprised representatives of Government sponsoring bodies, the Reviewer and an independent appointee (a senior Office of the Commissioner for Public Appointments assessor).
2. Dr Neil Williams' report on the Review was published on 2 December 2004, and announced that day by Written Ministerial Statement in both Houses of Parliament. Ministers are grateful to Dr Neil Williams for his report and concur with the views of the Review Committee, that it thoroughly covers the required scope, is unbiased and is of high quality.
3. This Government response to the Review report reflects the collective views of Ministers from the five sponsoring bodies for the AEBC: Defra, DTI, the Scottish Executive, the National Assembly for Wales and the Departments of Environment and Agriculture & Rural Development in Northern Ireland. In coming to its conclusions, Government has carefully considered the findings and recommendations from this independent Review, which are based on extensive consultation with stakeholders. When considering its response Government has further engaged with stakeholders, for example the Chair and Deputy Chair of the AEBC and key bodies that will in some way carry its legacy forward.
4. Downloadable copies of the Review report, Government's response and associated Written Ministerial Statements can be found on the OST website¹⁹.

¹⁸ 'Guidance for Reviewing NDPBs', November 2003, CO.
http://www.civilservice.gov.uk/improving_services/agencies_and_public_bodies/guidance_for_departments/index.asp

¹⁹ www.ost.gov.uk/policy/bodies/review.html

The Advisory and Regulatory Framework for Biotechnology

1. The remit of the AEBC is to provide the Government with independent, strategic advice on developments in biotechnology and their implications for agriculture and the environment. It looks at the broad picture, taking ethical and social issues and public attitudes into account as well as the science and Members bring a wide range of skills and expertise to this work.

2. The AEBC was set up in June 2000 following a review in 1999 of the Advisory & Regulatory Framework for Biotechnology²⁰. The main concerns that emerged from this Review were that:

- *'current regulatory and advisory arrangements are of necessity complex and are difficult for the public to understand;*
- *'they do not properly reflect the broader ethical and environmental questions and views of potential stakeholders; and*
- *'they are not sufficiently forward-looking for so rapidly developing a technology.'*

3. The creation of the AEBC was part of a new approach to establish a strategic advisory framework for biotechnology assessing agricultural and environmental issues. The Human Genetics Commission was the other biotechnology-specific body created at the same time, to work alongside the Food Standards Agency (FSA) and the AEBC, in this strategic framework.

4. The 1999 Review facilitated a number of positive changes in the operation of the advisory and regulatory framework for biotechnology, which we should continue to build on. For example:

- the need for some committees to consider and respond flexibly to the wider implications of generic types of biotechnological development and to provide strategic direction;
- the continuing need for transparency and openness; and
- the need, where appropriate, to consider the broader ethical, social, legal and stakeholder perspectives, including public attitudes.

5. AEBC's remit does not include operational matters relating to approved products containing GMOs or products derived from GMOs. These are either considered under general requirements of the deliberate release directive and ACRE give advice (see Annex D) or are considered under specific products

²⁰ *The Advisory and Regulatory Framework for Biotechnology: Report from the Government's Review*, May 1999, CO/OST. http://www.ost.gov.uk/policy/issues/biotech_report/index.htm

legislation (see below). Advice on these issues is obtained from the relevant advisory committees identified below.

Food and feed

6. **The Food Standards Agency**²¹ is a UK-wide, independent Government Agency which was created to protect the interests of consumers. Its guiding principles are to put the consumer first, to be open and accessible and to be an independent voice. The Agency's remit is to protect the interests of consumers to ensure food safety and consumer choice. In relation to GM foods the Agency has responsibility for ensuring that all foods on sale in the UK have been thoroughly assessed for safety and that consumers are given choice as to whether to buy or not. Its responsibilities also cover the safety and use of animal feeds in relation to the protection of human health. The Agency receives independent expert advice from the **Advisory Committee on Novel Foods and Processes**²² and the **Advisory Committee on Animal Feedingstuffs**²³.

7. The Agency is not directly responsible for assessing environmental issues associated with the production of such foods, nor is it responsible for dealing with wider issues such as the ethical implications of GM technology. The Agency regularly investigates consumer attitudes about a wide range of food issues, including general food safety, the regulatory system, and food preferences, using both qualitative and quantitative methods. This work has included questions about attitudes towards GM foods.

GM forestry

8. **The Forestry Commission**²⁴ is responsible to Forestry Ministers in England, Scotland and Wales. In addition to advising on policy, it delivers forestry policy in the three countries; this includes managing public forests. In Northern Ireland, these functions are carried out by the Forest Service which is an agency of the Department for Agriculture and Rural Development. The Commission and the Service have a variety of stakeholder panels and work closely together and with industry. The Commission sponsors research on biotechnology in a number of topic areas, including a small research programme on GM trees.

Veterinary products

9. There is an EU regime regulating the approval of veterinary medicines, including those containing GMOs.

²¹ <http://www.food.gov.uk/>

²² <http://www.food.gov.uk/science/ouradvisors/novelfood/>

²³ <http://www.food.gov.uk/science/ouradvisors/animalfeedingstuffs/>

²⁴ <http://www.forestry.gov.uk/>

The Policy Context for the Work of the AEBC

1. The policy on and regulation of biotechnology, and specifically genetically modified organisms (GMOs), has moved on considerably since the AEBC was set up in 2000. At that time there was deep controversy over GM, with little public engagement, or confidence in, advice on biotechnology and considerable debate both within and outside Government on the best way forward. Since that time the legal framework has been significantly strengthened and Government has set out its policy on the commercial growing of GM crops²⁵. The revised directive on the deliberate release and marketing of GMOs (Directive 2001/18) came into force in October 2002. This strengthened, for example, requirements for public consultation on the deliberate release of GMOs, environmental risk assessments covering indirect and long-term effects (e.g. on biodiversity) and post market monitoring in case of any unanticipated adverse effects. Tough new regulations on the safety assessment, authorisation and traceability and labelling of GM food and feed came into force in April 2004 to ensure consumers can choose between GM and non-GM products. The FSA are responsible for the safety assessment of all GM food and feed applications. New regulations on international trade in GMOs also came into force during 2004. Government are also continuously seeking to make the regulatory process more open, for example through greater transparency and provision of accessible information on websites and through the Environmental Information regulations.

2. The AEBC has already produced three major reports: on GM crops and the Farm Scale Evaluations of GM herbicide-tolerant crops; GM animals; and coexistence and liability in relation to GM crops. Its advice informed Government's GM policy statement in March 2004. The GM public debate was set up in 2002 as a result of the recommendations made in the AEBC's '*Crops on Trial*' report. The animals report concluded that GM and cloned animals should be part of the same regulatory system as other animals wherever possible. Defra announced in July 2004 how it planned to engage with stakeholders on the development of a co-existence regime. This will aim to minimise unwanted GM presence in neighbouring non-GM crops, and to at least below the European Union's 0.9% labelling threshold on a worst case basis. In addition, Defra will consult on whether a lower GM threshold might apply for organic production, and on options for compensating non-GM farmers who suffer financially because a GM presence exceeds statutory thresholds. A written consultation document will be published later this year. It remains Government's clear intention to introduce co-existence measures before any cultivation of GM crops takes place in the UK. No commercial cultivation is expected before 2008 at the earliest.

²⁵ 'GM Dialogue: Government response', 9 March 2004, Defra, SE, NAW, DOENI.
<http://www.defra.gov.uk/environment/gm/debate/pdf/gmdialogue-response.pdf>

3. The AEBC is currently working on non–food agriculture and research agendas and final reports on these topics are due to be completed in April 2005.

4. The AEBC's remit has never included GM food or related issues, which is the responsibility of the FSA. Details of the FSA role are included in Annex B.

AEBC-Related Issues and Advisory Bodies

Sustainable agriculture and environment

1. There are a number of bodies that provide advice on agriculture and environment issues. Two significant examples of independent, strategic bodies are the Sustainable Development Commission²⁶ (SDC) and the Royal Commission on Environmental Pollution²⁷ (RCEP).
2. **The Sustainable Development Commission** is a UK-wide body giving strategic, independent advice on all aspects of sustainable development. The Commission, chaired by Jonathon Porritt, decides its own work programme and reports to the Prime Minister and the First Ministers of the Devolved Administrations. Its members bring with them a wide range of experience and expertise from business, local Government and non-Government sectors and to reflect the diversity of the UK population.
3. The specific tasks of the commission are to:
 - identify key unsustainable trends, which will not be reversed on basis of current or planned action, and recommend action to reverse trends;
 - encourage and stimulate good practice;
 - act as a 'critical friend' to Government in appraising its performance in delivering sustainable development;
 - establish good working relationships with key parts of Government in promoting sustainable development; and
 - deepen awareness of the concept of sustainable development within key sectors, increase awareness of the issues it raises, and build agreement on how to address them.
4. The Commission regularly invites people to work with it in shaping advice and programmes, for example via discussion fora, facilitated workshops, electronic roundtables, seminars, and e-bulletins.

²⁶ <http://www.sd-commission.org.uk/>

²⁷ <http://www.rcep.org.uk/>

5. **The Royal Commission on Environmental Pollution** is an independent, UK-wide standing body established in 1970 to advise the Queen, the Government, Parliament and the public on environmental issues. Its remit is to advise on matters, both national and international, concerning the pollution of the environment; on the adequacy of research in this field; and on the future possibilities of danger to the environment. Within this remit, where 'pollution' is interpreted broadly, it has the freedom to consider and advise on any matter it chooses. This includes biotechnology aspects if relevant, and the RCEP has addressed biotechnology in the past, with its Thirteenth Report in 1989 on The Release of Genetically Engineered Organisms to the Environment. It approaches issues within the framework of sustainable development.

6. RCEP sees its role as contributing to policy development in the longer term: by reviewing and anticipating trends and developments in environmental policies; identifying fields where insufficient attention is being given to problems; and recommending action that should be taken. This requires consideration of the economic, ethical and social aspects of an issue as well as the scientific and technological aspects. Members are drawn from a variety of backgrounds in academia, industry and public life, contributing a wide range of expertise and experience in science, medicine, engineering, law, economics and business.

7. The Commission has taken steps to make its work more transparent and open. For example, by introducing much more extensive consultation about its future programme of work, the issues to be considered in a study, and the implications and impact of reports. Agendas of meetings are published in advance and minutes shortly afterwards. Commission meetings are not normally open to the public, but many of these are evidence sessions where a full transcript is made available afterwards.

8. Although funded by Defra, the Commission is independent of Government departments.

9. **The Government response to the report of the Policy Commission on the future of farming and food** (the Curry Commission Report²⁸) includes a new markets and new technologies workstream. It aims to make a substantial contribution to the sustainability of agriculture, by supporting diversification through the development of new markets for non-food crops and new technologies. The workstream has four workstrands:

- The Research Priorities workstrand (see '*Horizon scanning*' below).
- The GMO workstrand, which aims to facilitate the potential use of GM technology to deliver sustainable economic and environmental developments in agriculture through developing new products and markets.

²⁸ The Policy Commission on the Future of Farming and Food, chaired by Sir Don Curry, which reported in January 2002. <http://archive.cabinetoffice.gov.uk/farming/index/commissionreport.htm>

- The Non-Food Crop workstrand, which aims to develop non-food products and markets for agriculture in order to enhance sustainability of the farming industry and the rural economy.
- The Non-Departmental Public Bodies workstrand, which aims to establish effective public representation on NDPBs, in relation to R&D, regulation and standard setting, in order to enhance public confidence in Government decision-making on agriculture and food issues.

Science and the safety and impact of GMOs

10. **The Advisory Committee on Releases to the Environment**²⁹ (ACRE) is an independent advisory committee, composed of leading science, environment and agriculture experts, whose main function is to give statutory advice to Ministers in UK Government and Devolved Administrations on the risks to human health and the environment from the release and marketing of GMOs. The Committee works within the current legislative framework and provides advice on:

- whether consents to release or market GMOs should be issued and any conditions which should be attached to consents;
- the limitations and conditions of consents issued to release or market GMOs, which covers post-release monitoring and provision to make amendments to consents;
- fees and charges relating to the cost of issuing consents and in respect of maintaining inspection and enforcement regimes; and
- the making of regulations under Part VI of the EPA 1990 and the deliberate release directive.

11. In addition, ACRE provide advice on:

- the evaluation of new GM research findings;
- any science-based GM matter;
- research needs in the area of risk assessment of GMOs; and
- releases into the environment of non-indigenous animals and plants.

12. **The Science Advisory Council**³⁰ (SAC), established in February 2004 provides Defra with expert and independent strategic advice on science policy and strategy. It helps to guide scientific priorities and work across the complete range of the Department's policy activities, including horizon

²⁹ <http://www.defra.gov.uk/environment/acre/>

³⁰ <http://www.defra.gov.uk/science/SAC/default.asp>

scanning as well as dealing with the immediate risks and opportunities. SAC is the senior NDPB offering independent scientific advice to Defra's Chief Scientific Adviser, and through him to Ministers.

13. SAC members are selected for their breadth of relevant scientific knowledge, including the social sciences, rather than for their individual specialisms. There is also a non-scientist lay member. The Council is expected to meet 4 times per year, and it is likely that at least one meeting a year will be open to the public. Wherever possible, advice from the SAC will be placed in the public domain after the Defra Chief Scientific Adviser has considered it.

14. The Scottish Executive's Environment and Rural Affairs Department (SEERAD) is intending to establish a **Strategic Advisory Panel**, one of whose functions will be to provide independent advice on the strategic development of the Department's research programme.

15. In Northern Ireland, the Science Service in the Department of Agriculture and Rural Development (DARD) provides a range of appropriate advice across Government. In particular, it offers support to policy makers in the Department of the Environment in relation to the potential impact of GM crops and plants. In future, DARD strategy and programmes will be subject to more targeted stakeholder input, most notably via an **Independent Expert Advisory Board** (IEAB) that is to be established.

16. The National Assembly for Wales does not have a separate agricultural research budget, but works with Defra to determine how UK departmental funding covering both Wales and England can be used to best effect.

Horizon scanning

17. Government recognises the importance of looking forward, to identify issues that may arise as a result of new science and its applications. In the ten-year investment framework for science and innovation³¹ we announced the formation of a new **Centre of Excellence in Science and Technology Horizon Scanning**³². This Centre, which is based in OST and builds on the work of the existing Foresight programme, has now begun its operations.

18. The fundamental purpose of Horizon Scanning is to scan systematically for potential future threats, trends, and opportunities. Investigation of 'science' issues will encompass all evidence streams, including economics, social sciences, ethical concerns and public opinions. This horizon scanning function will provide the strategic context to horizon scanning activity in Government departments and elsewhere. It will also inform Government's strategy for public engagement with science, to enable

³¹ 'Science & Innovation Investment Framework 2004 – 2014', July 2004, HMT, DfES, DTI.

http://www.hm-treasury.gov.uk/spending_review/spend_sr04/associated_documents/spending_sr04_science.cfm

³² http://www.foresight.gov.uk/about_foresight/new_horizon_scanning_centre_of_excellence.html

this to identify at the earliest possible stage areas where potential health, safety, environmental, social, ethical and regulatory issues may arise and how these might be addressed.

19. The Centre will have a UK-wide remit and draw on evidence from around the world. It will report to the Chief Scientific Adviser and Ministers. Government believes that the Centre will be most effective if it works with and alongside existing key bodies such as Research Councils UK, the Technology Strategy Board, the Chief Scientific Advisors' Committee and the Council for Science and Technology. In doing this it will also be resourced to engage with the wider range of stakeholders to both provide input and test outputs.

20. The Sustainable Farming and Food **Research Priorities Group**³³ (RPG) aims to provide an independent and open source of advice to Defra on the strategic priorities for publicly funded research in support of sustainable farming and food industries in the UK. The RPG held extensive stakeholder consultation in 2004 and a report on the outcome of its work was published on 22 March 2005. This is intended to move the Defra research agenda closer to the priorities recommended by the RPG. The RPG also aims to promote better co-ordination and integration between the funders of the research priorities that it recommends.

21. In Scotland, SEERAD will look to its new Strategic Advisory Panel for advice on how to take forward horizon scanning activities, to inform the future development of the work that it funds.

GM forestry

22. **The Forestry Commission**³⁴ is responsible to Forestry Ministers in England, Scotland and Wales. In addition to advising on policy, it delivers forestry policy in the three countries; this includes managing public forests. In Northern Ireland, these functions are carried out by the Forest Service which is an agency of the Department for Agriculture and Rural Development. The Commission and the Service have a variety of stakeholder panels and work closely together and with industry. The Commission sponsors research on biotechnology in a number of topic areas, including a small research programme on GM trees.

GM animals – welfare and other issues

23. Existing bodies include **the Farm Animal Welfare Council**³⁵ (FAWC), **the Companion Animal Welfare Council**³⁶ (CAWC) and **the Animals Procedures Committee**³⁷ (APC), which reports to the Home Office. These

³³ http://www.defra.gov.uk/science/rpg/research_priorities.htm

³⁴ <http://www.forestry.gov.uk/>

³⁵ <http://www.fawc.org.uk/>

³⁶ <http://www.cawc.org.uk/>

³⁷ <http://www.apc.gov.uk/>

groups already cover GM issues raised by use of biotechnology and both FAWC and APC have produced reports on biotechnology issues.

Non-food crops

24. On 5 November 2004 Defra and DTI jointly published '*A Strategy for Non-Food Crops and Uses – Creating value for renewable materials*'. This was aimed at increasing commercial opportunities, stimulating innovation, cutting waste and environmental damage, and protecting precious natural resources. An action plan within the document covers areas such as tackling climate change, funding more scientific research and increasing the use of sustainable products.

25. The National Non-Food Crops Centre³⁸ was created over a year ago as a result of an OST Foresight recommendation. Part of its remit is to further Government's objectives for sustainable development in the area of non-food crops, for example by advising Government on the environmental, social and economic implications of particular crop uses and the barriers to their development.

³⁸ <http://www.nfccc.co.uk/>

Interim Government Response: Letter to Professor Malcolm Grant CBE from Patricia Hewitt and Margaret Beckett

17 March 2005

Professor Malcolm Grant CBE
Chairman
Agriculture and Environment Biotechnology Commission
c/o Secretariat, Bay 309
1 Victoria Street
London
SW1H 0ET

Dear Professor Grant

As you know, the UK Government and the Administrations in Scotland, Wales and Northern Ireland have been considering our response to the review of the Agriculture and Environment Biotechnology Commission³⁹, including the need to establish new capacity for independent advice to Government on the environmental impacts of agriculture.

We would like to take this opportunity to emphasise how much we value the excellent work that the AEBC has done. It was given a challenging remit at a time of deep controversy and polarisation of views over GM. The policy on and regulation of biotechnology, and specifically genetically modified organisms, has moved on considerably since the AEBC was set up in 2000. The Government has established its policy on the commercial growing of GM crops, informed by the AEBC's reports and there is no commercial cultivation expected in the UK before at least 2008.

We are grateful for your letter of 18 January which summarised Commission Members' reaction to the Review report and their thoughts on the future. Your letter also defined the legacy of the AEBC as including aspects of ways of working, particularly: independence, openness, transparency, public engagement, reporting lines to Government, and in general learning lessons from the AEBC experience. We agree with these reflections, and the need to ensure that Government draws on the experience of the AEBC.

We are writing to let you know what Government's interim conclusions are as unfortunately, we are not yet in a position to provide that full response before your final scheduled meeting on 21 March. But we are aiming to provide a full response by the end of March.

³⁹ <http://www.aebc.gov.uk/>

Government agrees with the conclusions of the Review, that the AEBC has now largely discharged its original remit and should be wound up once its existing work programme is completed.

The Review report reflected an emerging view that strategic GM, animal and crop issues might in future be best considered as part of the wider issues of sustainable agriculture and the environment, but it was felt that this would not be best done through continuation of the AEBC. We believe that between them, existing bodies can play a part in taking forward all of the roles of the AEBC, in terms of encompassing the biotechnology aspects, addressing your important conclusions about the impact of conventional agriculture on the environment and meeting the need for broader integration of biotechnology issues with wider agriculture and environment considerations. However, we are still considering how the different roles of the AEBC can be specifically addressed by existing bodies, and will come to conclusions on this in our full response. We can confirm that we intend to establish additional capacity for independent advice to government on the environmental impacts of agriculture. We are consulting the Sustainable Development Commission and other relevant bodies on the best framework for advice on all of these issues.

More broadly, we recognise the importance of looking forward to anticipate issues and in the ten-year investment framework for science and innovation we announced the formation of a new OST-based Centre of Excellence in Science and Technology Horizon Scanning. This Centre, which has now begun its operations, will provide the strategic context to horizon scanning activity in Government departments such as the work of the Defra Research Priorities Group. We are keen to ensure that this work provides Government with early warning and insights into new developments, including those covered by the AEBC.

We have taken steps to further strengthen the UK research-base. Over the next three years, funding for the Biotechnology and Biological Sciences Research Council will rise by 33% to over £1 billion and funding of the Economic and Social Research Council will increase by 43% as a result of the new science spending allocations that were announced on 7 March.

Many of the characteristics of the AEBC (its broad based approach, its openness and its engagement with the public) are now part of the way of working of Government in general and the work of our other strategic advisory Non-Departmental Public Bodies. You have set a high standard to follow in a challenging area. We are moving away from 'the public understanding of science' towards a two-way engagement and dialogue aimed at promoting improved mutual understanding between scientists, science policy makers and the general public. We are also now focusing on early (upstream) dialogue on the ethical, health and safety and environmental implications of new science and technologies, including biotechnology. We want to continue this shift, and to explore ways in which we can ensure this approach is consistently and effectively pursued.

We understand your view is that the end of April 2005 is a reasonable time by which to have completed the Commission's work. We would be grateful for confirmation of this, and we will then write to yourself and the Members formally setting that date and standing the membership down.

Finally, and certainly not least, we would like to take this opportunity to thank you and all the members of the Commission for your dedication and hard work over the last five years. We know that you all have put significant time and energy into advising Government and we are very grateful for this.

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