

**Position Paper for the COP12-MOP7 Conference of the  
UN Convention on Biological Diversity in  
Pyeongchang, South Korea, 2014**

*Japan Citizens' Network for Sustainable Food and Agriculture is a network of civil society organizations (CSO) and non-profit organizations (NPO) in Japan. We respectfully submit the following proposals and requests for the COP12-MOP7 conference to be held in Pyeongchang, South Korea.*

**Japan Citizens' Network for Sustainable Food and Agriculture  
Nishi Waseda 1-9-19-207  
Shinjuku-Ku, Tokyo  
Japan 169-0051  
<http://fa-net-japan.org/>**

Over the past 10 years, we have conducted investigations of wild-growing genetically modified canola at a large number of locations in Japan. Over 1500 volunteers and experts have participated every year. We have found wild-growing GM canola not only near import harbours along the coast and by major roads leading to food oil companies that process the canola seeds, but also at other spots, including inland residential areas. Having carefully checked the extent of this GM contamination all over Japan, we are in a unique position to discuss Living Modified Organisms and the way such LMOs can spread and affect local biodiversity.

We have found that hybridization of GM canola inevitably happens, including crossing with local mustard plants, broccoli and weeds. Thus we are very aware of the dangers of Living Modified Organisms resulting in GM pollution, and our experience is that decontamination to avoid further risks to local biodiversity is time-consuming and costly. In addition, we have found "hidden GMO" from wild-growing canola plants that on first inspection seemed to be non-GMO, but further PCR testing identified the plants as being genetically modified. Such wild-growing GM canola may be the result of crossing or hybridization.

We strongly agree that the precautionary principle should be regarded as a corner stone of the Convention on Biological Diversity and the Cartagena Protocol. Based on this, we have the following urgent requests:

**Article 17: Unintentional transboundary movements and emergency measures**

In Japan, we now know based on 10 years of experience that imported GM canola seeds will spread and grow wild in many places. In case of continued import, there is a need for advance strategies to avoid GM canola seeds to fall off conveyor belts and trucks, to avoid GM contamination of local biodiversity. Preventive measures at national borders and import harbours should be in place. We strongly demand that such contamination events do not continue to happen. Moreover, the polluter-pays principle should apply. It is costly to fully investigate the contamination and communicate all the results, so that the damage will be kept at a minimum in case any emergency situations occur.

**Article 18: Handling, transport, packaging and identification of living modified organisms**

Measures must be taken to prevent GM canola contamination during the handling, transport, and packaging of all imported GM crops. Identification systems are necessary to get the correct information regarding what kind of Living Modified Organism is being imported. Such information should be widely released to all stakeholders. We do not accept the “May contain” labeling of imported GM crops. We strongly urge the relevant authorities to provide information about the necessary inspection/testing methods. The legal system should incorporate a punitive clause to discourage exporters and importers from handling illegal, non-authorized Living Modified Organisms, based on the polluter-pays principle.

**Article 27: Liability and redress**

After four years, Japan has not yet ratified the Nagoya-Kuala Lumpur Supplementary Protocol which was an important result of the COP10-MOP5 conference in Nagoya, 2010. GM contamination cannot be properly dealt with

and avoided without concrete measures, such as efforts to restore and redress biodiversity damage, which may be costly. Compensation from the corporations or others that caused the GM contamination must be ensured. While this Supplementary Protocol in itself does not stop GM contamination, it is a major tool for importing countries to put in place a robust legal framework that protects local biodiversity (with national rules that are acceptable under each country's obligations to the World Trade Organization, etc.).

#### **Article 15, 16: Risk assessment and risk management**

In most cases, the influence of Living Modified Organisms on biodiversity is not well known, and the food safety risks are also unknown. We regard strict and objective risk assessment and risk management to be essential requirements. Such efforts have been rejected, discarded and even ridiculed by the biotech industry and the few countries that are the main exporters and global promoters of genetically modified crops, based on outdated arguments and lack of concern for biodiversity. We strongly request risk assessment and risk management policies that can protect Earth's biodiversity and the health of human beings.

#### **Article 26: Socio-economic considerations**

We regard this work on socio-economic considerations to be epoch-making, and strongly support it. We understand that the expert meeting (AHTEG) has only just begun to discuss it. We request that countries avoid making this into a battle between developed and developing countries, but regard it as a key issue for the progress of the Convention on Biological Diversity.

(END)