

28 August 2024

NGOs urge IUCN to halt the development of its policy on synthetic biology in relation to nature conservation

Dear IUCN Policy Development Working Group on Synthetic Biology in relation to Nature Conservation,

We, non-governmental organizations both national and international, including science organizations, have become aware of the ongoing process to develop an IUCN policy on synthetic biology in relation to nature conservation. Given that these policies could have global environmental implications, we have looked closer at this undertaking and are deeply concerned about the apparent inadequacies in how the process is being handled. Resolution 123, adopted at the last IUCN Congress in Marseille in 2021, requested the initiation of an inclusive and participatory process for this policy. The outcome will be debated and voted on at the next Conservation Congress in Abu Dhabi, UAE, 2025.

Unfortunately, the process has inconsistencies that undermine a fair and competent participatory approach, failing to accommodate diverse stakeholders, especially smaller organizations and diverse knowledge-holders critically important to the process. For example, there is a failure to ensure the explicit engagement and effective participation of indigenous peoples and local communities from all geographic regions.

First, some of the content in the Annexes of Resolution 123 that was central for support when the Resolution was voted on in Marseille was unfortunately already lost in the Terms of Reference (ToR) in C109/8 where concerns were not taken into account. This in turn results in a biased process from the start, with deficiencies in structure and organization, member selection, and choice of background literature. The use of the publication “Genetic Frontiers for Conservation” is of particular concern as it is biased and largely one-sided, and many of its authors have a conflict of interest on this topic.

Second, the process is largely opaque. The process has experienced significant transparency issues, including uncommunicated delayed starts as well as undisclosed meeting dates for expert groups. Deliberations and reflections leading to the creation of the first draft of the policy proposal have not been made public. New deadlines for various work streams have been introduced unexpectedly, and the materials used to train the citizens' assembly are not publicly accessible. This lack of clarity and open communication has made it challenging for participants to engage effectively in the whole process, as for example, reflected by the minimal response to the call for background documents in August 2023.

Third, evaluating the IUCN citizens' assembly against the 27 key criteria set by the Council of Europe's European Committee on Democracy and Governance (CDDG) for assessing dialogue process competence reveals significant shortcomings, suggesting that the citizens'

assembly fails to meet the standards of an effective dialogue process. Moreover, the Working Group overseeing the process did not include anyone who supported the IUCN's current de facto stance on synthetic biology, which advocates for a moratorium based on the precautionary principle. Yet, despite this imbalance, the same group was tasked with organizing a balanced and impartial process, ultimately leading to a significant policy shift away from this precautionary approach.

Additionally, participation, as laid out above, was minimal, rendering any outcomes as not legitimately representative of IUCN members' views. The ongoing parts of the process seem no better suited for inclusion and participation: the "feedback template" is based on assumptions that are not based on discussion, let alone agreement, as it jumps to an assessment of risks and benefits without prior consideration of more fundamental questions. Also, it seems more geared towards collecting expert knowledge than towards allowing participation of the general membership. For a detailed analysis of how the process has failed to meet acceptable standards, please refer to the attached Annex: "A provisional evaluation of the IUCN Citizens' Assembly on Synthetic Biology in relation to Nature Conservation 2023-24".

Lastly, it remains unclear how the trainers/facilitators for the process were selected and whether they meet the required criteria established in the RfPs. Concerns include whether One Planet Solutions (OPS) qualifies as a "respected scientific institution" as required and whether both ICGEB and OPS have demonstrated the necessary "expertise and impartiality." This is particularly of concern as the founding articles of ICGEB commit the organization "to promote the application of genetic engineering and biotechnology" to address issues especially in developing countries. While ICGEB's 2020-2030 strategic plan details the organization's core work in research, technical development, technology transfer, industrial training, and regulatory matters, it does not mention any competencies in deliberative dialogue processes, ethics, or citizen engagement, nor does it address conservation objectives. In light of its mission, it thereby seems that ICGEB might have a conflict of interest when managing a fair and unbiased deliberation process on the acceptability and ethics of biotechnology applications.

For these reasons, we respectfully request that you halt the development of the IUCN policy on synthetic biology in relation to nature conservation. This halt should remain in effect until the IUCN guarantees that all criteria for inclusive participation and impartial oversight are fulfilled. Not addressing this could lead to the development and implementation of a policy that might ultimately have negative impacts on biodiversity and nature conservation.

With warm regards,



Organizations

A Bigger Conversation/Beyond GM	United Kingdom
Acción Ecológica	Ecuador
ACTION plus	Benin
ACTIONS POUR LE DÉVELOPPEMENT DURABLE (ADeD)	Benin

Organizations

Agent Green	Romania
Alliance for Humane Biotechnology	United States of America
The Bioscience Resource Project	United States of America
Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL)	Germany
Canadian Biotechnology Action Network (CBAN)	Canada
Center for Food Safety	United States of America
Centro de Protección de la Naturaleza (CE-PRO-NAT)	Argentina
Corporate Europe Observatory (CEO)	Europe
Coalition pour la Protection du Patrimoine Génétique Africain (COPAGEN)	Benin BF Cote d'Ivoire Guinee Guinee Bissau Mali Niger Senegal and Togo
Colectivo Tá	Uruguay
Confédération Nationale des Organisations paysannes de Guinée (CNOPG)	Guinee
Consumers' Association of Penang	Malaysia
EcoNexus	United Kingdom
Ecoropa	Germany
ENSSER	Netherlands
ETCgroup	Canada
Ethical And Respectful Treatment of Humans (EARTH)	United States of America
Fédération AgroEcologique du Benin (FAEB)	Benin
Forschungs- und Dokumentationszentrum Chile-Lateinamerika e.V (FDCL)	Germany
Foundation for Future Farming	Germany
Friends of the Earth Canada	Canada
fruchtwechsel e. V.	Germany
Fundación Pro Defensa de la Naturaleza y sus Derechos	Ecuador

Organizations

GE Free Comox Valley	Canada
GE free New Zealand	New Zealand
GEKKO Stiftung	Germany
Gen Au Rheinau	Switzerland
Gene Ethics	Australia
GenEthisches Netzwerk	Germany
Global Justice Ecology Project	United States of America
GM Freeze	United Kingdom
GM Watch	United Kingdom
GMO Free Canada	Canada
GMO/Toxin Free USA	United States of America
Greenhorns	United States of America
The Green Network Project	France
Health Research Institute	United States of America
IG Saatgut	Germany
Institute for Responsible Technology	United States of America
Interessengemeinschaft gegen die Nachbaugesetze und Nachbauggebühren	Germany
JINUKUN	Benin
Les Amis de la Terre	France
Mange Ram Adhana	India
Museo del Hambre	Argentina
National Association of Professional Environmentalists (NAPE)/ Friends of the Earth Uganda	Uganda
National Farmers' Union	Canada
NOAH - Friends of the Earth Denmark	Denmark
OGM dangers	France

Organizations

Plataforma Transgenicos Fora	Portugal
La Red Por una América Latina Libre de Transgénicos (RALLT)	Ecuador
REDES. Amigos de la Tierra Uruguay	Uruguay
Regeneration International	Mexico
Safe Food Matters Inc.	Canada
SAPPROS Nepal	Nepal
SaskOrganics Association Inc.	Canada
Save Our Seeds	Germany
Searice	Philippines
SOS MAIZ BOLIVIA	Bolivia
Sustainable Development Institute	Liberia
Terra à Vie	Burkina Faso
Terre d'abeilles	France
TestBiotech	Germany
Toronto Non GMO Coalition	Canada
Third World Network (TWN)	Malaysia
Unión Científic+s comprometid+s con la Sociedad y la Naturaleza en América Latina (UCCSNAL)	Latin America
Via Orgánica	Mexico
Vigilance OGM	Canada
Za Zemiata. Friends of The Earth Bulgaria	Bulgaria
