cban Canadian Biotechnology Action Network

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FSC and Genetically Engineered Trees: Action Needed

Update for FSC members

The Forest Stewardship Council Board of Directors will make a critical decision about genetically engineered (GE) trees in March 2023. FSC members have an important opportunity to communicate concerns about the FSC's "Genetic Engineering Learning Process" and communicate support for FSC's current prohibition on the commercial use of GE trees.

Background

In early 2022, FSC began phase one of a **"genetic engineering learning process"** (GELP), initiated under the Sustainable Intensification Advisory Group, to help FSC discuss "whether or not [they] should allow companies to be associated with FSC while using GE outside of any FSC certified operations."

At the October FSC General Assembly in Bali, a panel of experts appointed by the FSC Board presented a draft "participation framework" for the GELP. If the FSC Board allows the GELP to proceed to phase two, FSC would use this framework to **directly oversee field tests of genetically engineered trees**.

The FSC Board says no change to the Policy for Association will be considered until after the process is complete. However, **proceeding with the learning process puts the health of forests at risk, along with FSC's reputation**. No "safeguards" can fully protect forests from the risks posed by GE tree field tests, such as GE escape. FSC would need to account for any negative environmental and social consequences arising from these field tests.

Update

The 8th Sustainable Intensification newsletter, issued December 1st, outlines the next steps for the GELP and summarizes the discussions held on GE trees at the General Assembly.

The FSC Board decision on whether to advance or stop the GELP was expected in November but it will now take place in March 2023. **FSC members now have more time to voice their concerns**.

Both *motion 15* to stop the current process for sustainable intensification and *motion 44* to secure member-based decisions on the use of GMOs in the FSC-system were debated. While neither motion passed, discussions made it clear that there is no consensus on how or if FSC should broach the topic of genetic engineering.

FSC Executive Director Kim Carstensen stated: *"During the general assembly there were some issues that did not come together. One of these issues was on the topic of Genetic Engineering. Reflecting on the discussions, we have not come closer to each other on the topic, and more work is required to understand each other better."*

GELP Risks

In their General Assembly presentation, the GELP expert panel acknowledged that there are "possible" risks associated with field testing GE trees. **The GELP asks FSC to accept these risks.**

The risks include the escape of GE trees into forest ecosystems. Experience shows that the unwanted escape and spread of genetically engineered/modified organisms (GMOs) or genetic material is likely and, in some cases, inevitable. The stakes are high because it can be difficult or impossible to recall GMOs once released. GE contamination is living pollution that can self-replicate. **Once GE contamination in forests begins, it may not be possible to stop its spread.** If GE trees contaminate native forests, these forests will themselves become contaminants, creating a never-ending cycle. The impacts are unknown and could remain unknown for generations.

The draft participation framework states that the GELP will be "in compliance" with the Precautionary Principle but the risks posed by field tests and the vast unknowns relating to the environmental impacts mean that engaging with GE tests runs counter to the Precautionary Principle.

The proposed GELP would likely result in ad-hoc, uneven learnings that may have little utility for FSC discussions of genetic engineering. FSC is not a research organization and is ill-equipped to manage the roles and responsibilities.

To proceed with the GELP, FSC will need to assess these questions:

- **Does FSC accept the environmental risks posed by GE tree field tests?**
- **Do the benefits of the possible learnings of the GELP warrant taking these risks?**
- **Is FSC prepared to be held to account for any potential environmental impacts of proceeding with the GELP?**

Next Steps

In January 2023, a second draft of the GELP participation framework will be released for FSC member comment. The panel of experts will host a webinar presenting the framework. **They will incorporate feedback into a third and final draft to be presented to the FSC Board. In March 2023, the Board will decide whether or not to proceed with the "genetic engineering learning process."**

We encourage FSC members to communicate concerns about the GELP to the Board of Directors in advance of their March meeting. You can submit comments directly to the Board and participate in the feedback process outlined by the panel of experts.

The Canadian Biotechnology Action Network sent a detailed critique of the GELP to the Board (see resources below). We invite you to contact us if you have any questions or would like to discuss these issues further.

Resources

Our critique of the GELP, sent to FSC board November 2nd, 2022:

http://cban.ca/trees/FSCGELPletter2022

Our new report, available in English, Spanish, and Portuguese: "The Global Status of Genetically Engineered Tree Development: A Growing Threat"

stopGEtrees.or bal-status-report

Our briefing on genetic engineering within FSC, August 2022. Available in English, Spanish, Portuguese, French, Japanese, and Bahasa Indonesian:

stopgGEtrees.org/FSCbriefing

An open letter asking FSC to uphold its prohibition and refrain from engaging in GE tree field tests, signed by 129 organizations around the world, including 10 FSC members:

https://stopgetrees.org/129-groups-call-on-fsc/

Contact

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www.cban.ca/trees/fsc | www.stopgetrees.org