

FROM: Federation of Irish Beekeeping Associations

TO: Dr. Barry O Reilly, Secretary
Interdepartmental working group on co-existence
Department of Agriculture and Food
National Crop Variety Testing Centre
Backweston, Leixlip, Co. Kildare

DATE: 12 November 2004

RE: Genetic Modification Strategy:

We see two distinct issues arising on the growing of GM rape seed in Ireland:

- Possible effect on Bees
- Possible effect on Honey and other hive products.

Dealing with these in order:

Possible effect on Bees

We are concerned that there is not enough information on the acceptability to the bees of pollen and nectar from GM rape seed. Any damage to bees would have a major detrimental effect on the pollination of local crops and hedgerows, and not merely on the pollination of the GM rape seed in question. If the proposal to approve such a crop only allows for research which compares rape yields and ignores both other crops and hedgerows, it will ignore a community cost and would show an unfair bias towards GM crops.

Possible effect on Honey and other hive products

Whether or not any GM pollen content harms honey, our concern is with the reaction of the consumer.

There is a perception among many that GM pollen is not acceptable content in a premium quality product such as Irish honey and we are concerned that, if GM crops were approved, such a perception would damage the market for Irish Honey.

These concerns would apply also to a lesser extent to wax, pollen, propolis and other hive products.