

CHURCH OF SOUTH INDIA
Madhya Kerala Diocese

CSI Bishop's House, Kottayam - 686 001
Kerala State, India



Rt. Rev. Thomas K. Oommen
Bishop

Saturday, April 27, 2013

Shri Jaipal Reddy
Hon'ble Minister for Science and Technology
Government of India.

Dear Shri Jaipal Reddy,

Sub: Biotechnology Regulatory Authority of India (BRAI) Bill 2013 – reg.

Greetings from CSI Madhya Kerala Diocese.

This is to express our utter dismay and disappointment at the manner in which the controversial and objectionable Biotechnology Regulatory Authority of India (BRAI) Bill 2013 was introduced by you in the Lok Sabha, ironically on The World Earth Day! This proposal for BRAI is a direct threat to the health of our citizens, our environment and our farm livelihoods, given the deeply flawed approach and specific contents of the Bill.

CSI Madhya Kerala Diocese strongly condemns the anti-transparency provisions proposed in the Biotechnology Regulatory Authority of India Bill (BRAI) 2013 and the attempt to override provisions of the Right to Information Act by empowering the proposed authority as the final decision maker in matters of release of information. The Bill is in violation of the provisions and spirit of the Right to Information Act.

The BRAI Bill is also a regrettable attempt to curtail spaces for people's participation and democratic oversight in decisions that could affect the lives of the entire population of our country.

The church cannot be indifferent to issues that vitally affect life on this planet and the integrity of creation. By unnaturally intervening into the order of creation, we are not only playing God, but also destroying the integrity of God's creation, and meddling with biodiversity and the life-sustaining interdependence among species. "Mixing genetic material from species that cannot breed naturally, takes us into areas that should be left to God. We should not be meddling with the building blocks of life in this way." (Prince Charles, quoted in the BBC News, Online Network: 26 February 1999)

It is obvious that the introduction of GM crops would contaminate the large number of traditional crops available to us, particularly those with unique medicinal properties. This would also shift the control of seeds from the farmers to profit hungry corporations that have already established virtual monopoly over seeds through the new patent regime. As a nation and as a community, what is at stake is not only our food security but also our food sovereignty. The inevitable consequences would be the disempowerment of small and marginal farmers, and their displacement by aggressive models of corporatized agriculture. Insertion of genes into the genome of a particular organism can result in unintended effects. The native genes of the crop could be affected in unpredictable ways. Unknown toxic/allergenic components could be generated. The available tests look only for known toxic elements. Scientists of all persuasions warn us that Genetically Modified (GM) food can have unforeseen negative consequences on the health of animals and human beings. Such effects will elude the conventional test regimen.

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Acknowledging the position of the World Council of Churches and the Courts of many civilized nations, we appeal to the government to apply the precautionary principle in the introduction of GE crops and not to be influenced by corporate entities that strive to establish their monopoly on every aspect of agriculture. It is important to decide whether the introduction of GM crops serve the farming community in India or the seed corporations. There must be clarity about how the problem has been framed and who has done it and who the ultimate beneficiaries are. We must also know whether there are better, safer and more viable solutions. The adoption of a new technology calls for a process of deep interrogation, especially when there are apprehensions on potential hazards.

While science and technology have immense potential to further the cause of life, we also recognize that they can also be used to destroy life in the pursuit of profit and power. It is the inalienable obligation of a responsible government to ensure that the people are not subjected, even unwittingly, to "bio error or bio terror".

Joining the Justice, Peace and Creation Concerns of the World Council of Churches we affirm the following statements from the AGAPE document (3:3):

"We believe that God's economy of solidarity and justice for the household of creation includes the promise that the people of the world have the right to produce their own food and control the resources belonging to their livelihoods, including biodiversity. It is therefore the right and responsibility of governments to support the livelihoods of small farmers in the South and in the North. It is their right to refuse the demands of agribusinesses that seek to control every aspect of the cycle of life. Such an approach requires respect for indigenous spiritual relationships to land and the bounties of mother earth."

In 2009, Church of South India (CSI) Ecological Concerns Committee (SECC) strongly protested against the decision of the Genetic Engineering Approval Committee (GEAC), in approving the commercial cultivation of genetically modified (GM) Bt brinjal. CSI has a membership of four million people spread all over Andhra, Karnataka, Tamilnadu and Kerala. We have been actively involved in the eco-conservation programmes since 1992.

We urge you to withdraw this Bill, and instead propose a Biosafety Protection Law, which the Government of India should bring in through the coordinated efforts of various concerned ministries, but led by the ones whose mandate it is to protect biosafety. The least that should have been done is to circulate this Bill for widespread public consultations, in addition to seeking feedback from the state governments. It is also a travesty of transparent governance that your government holds high, that the draft of this bill was never opened up for public debate, and weighed against a Biosafety Protection Law.

Thanking you,

Yours sincerely,

†Rt Rev. Thomas K. Oommen
Bishop of CSI Madhya Kerala Diocese &
The Chairman of Ecological Department of the Diocese.

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