



**SUBMISSION TO
REVIEW OF THE MORATORIUM ON GMOs in
TASMANIA**

11 OCTOBER 2013

INTRODUCTION

CropLife Australia (CropLife) is the peak industry organisation representing the agricultural chemical and biotechnology (plant science) sector in Australia. CropLife represents the innovators, developers, manufacturers and formulators of chemical crop protection and agricultural biotechnology products. The plant science industry provides products to protect crops against pests, weeds and diseases, as well as developing crop biotechnologies that are key to the nation's agricultural productivity, sustainability and food security. The plant science industry is worth more than \$1.5 billion a year to the Australian economy and directly employs thousands of people across the country.

Over the past decade, Tasmania's agricultural sector has suffered a net loss of \$4 million per year due to a moratorium on genetically modified organisms (GMOs) that has provided little tangible benefit to the state in return. This is in stark contrast to mainland states that have generated over \$600 million in farm gate benefits from GM crops since 1996, without compromising their ability to successfully market conventional or organic produce.

Less than five per cent of Tasmania's food and agriculture sector is leveraging the GMO-free status to support their brand image. Given that those mainland states growing GM crops also target niche markets with non-GM crops, there appears to be little point of difference for Tasmanian growers.

Ten years of evidence shows that the moratorium has only managed to hurt the state's economy and has failed to give local growers an advantage in domestic and global markets. GM and non-GM crops are now grown successfully side-by-side in Australia and in 30 countries worldwide. Many other countries and regions have examined the potential for GMO-free marketing and almost all have concluded that any potential benefits do not outweigh the costs.

The moratorium also ignores the mounting evidence of the environmental benefits of GM crops. Globally, GM crop plantings have saved over 15 million hectares of forest and natural habitat, equivalent to a third of the arable land in Australia. Crop biotechnology is an important tool helping farmers become more sustainable by allowing them to produce more using less natural resources.

Tasmania's island state image is a valuable asset to the state's economy. The GMO moratorium, purportedly put in place to protect this image, has turned out to be an extremely costly investment that has delivered no measurable return to Tasmania's economic standing or competitiveness.

The world's population is predicted to increase to 9.6 billion by 2050, requiring an increase in global food production of 70 per cent. Providing enough food in the context of production constraints, volatile consumption patterns and a changing climate will be an unprecedented scientific, economic and public policy challenge. The situation provides an opportunity for the Tasmanian agricultural sector to both assist in the global food security effort and to profit from increased demand for their agricultural products. By having the option to adopt innovative farming practices, such as the sustainable and efficient use of crop biotechnology products, the Tasmanian farming sector will be able to produce more with less, strengthening both the sector itself and the regional communities that rely on it.

GM crops, an innovation of modern agricultural biotechnology, are another step along the same path of agricultural innovation that led to Australian inventions such as the combine harvester and 'Federation' wheat varieties. Despite a proven record of safety, every GM crop is subjected to intense global scrutiny. Globally, government regulators have independently reached the same conclusion - that cultivation of GM crops poses no greater risk to human health or the environment than cultivation of conventional (non-GM) varieties. More importantly, they are a necessary and important tool in meeting the global food and nutrition security challenge.

One threat to Australian farmers getting full benefit of this important agricultural innovation is the lack of a nationally consistent scheme for the use of gene technology in Australia. Unnecessary and overly stringent regulation brings with it an equally unnecessary cost burden. CropLife considers that all regulation should be commensurate with the associated risk, cost and benefit to the community. The current gene technology regulatory system in Australia already imposes a much greater level of

regulatory burden on the industry than occurs in some other countries, and this burden is exacerbated by unclear and inconsistent market interventions by state governments.

GM crops currently under development in Australia will help Tasmanian farmers to combat environmental stresses such as drought, acid soils and salinity, which are being caused by climatic changes and previous non-sustainable farming practices. There is also significant Australian research into GM traits that will bring health benefits to Tasmanian consumers, such as healthier starches and oils modified to be lower in saturated fats and with improved cooking qualities.

CropLife supports the ability of farmers to be able to plant those GM crops approved by the Gene Technology Regulator and not be further restricted by non-science based regulation. CropLife urges the Tasmanian Government to put political considerations aside and consider what is best for Tasmanian farmers and the Tasmanian agricultural industry. CropLife questions why Tasmanian growers are being penalised to promote a 'clean green' image that would still be maintained and arguably enhanced without a GMO moratorium¹.

CropLife's submission addresses the following questions raised in the *Issues paper: Review of the Moratorium on GMOs in Tasmania*:

- Is having a moratorium appropriate for Tasmania?
- Are there new or emerging opportunities in gene technology that could benefit Tasmania's primary industries, now or in the future?
- Is it possible for GM and non-GM crops to co-exist and not affect the marketing of Tasmania's products?
- What impact has the moratorium had on the research and development of new products or markets?
- Should Tasmania's policy allow for exemptions to a moratorium?
- What other relevant issues should be considered in this review?

¹ For a qualitative case study that examines the impact of the hypothetical introduction of GMOs on New Zealand's "clean green" marketing image, see Knight JG, Clark A and Mather DW (2013) 'Potential damage of GM crops to the country image of the producing country' *GM Crops and Food* 4:3, 1-7.

1. IS HAVING A MORATORIUM APPROPRIATE FOR TASMANIA?

Since the release in 2012 of the Macquarie Franklin report to investigate market, economic, social and environmental issues relating to Tasmania's GMO free status², it is clear that the GMO moratorium has been a trade and marketing disadvantage for Tasmania's primary industries. The Macquarie Franklin report found:

- The non-GM canola seed industry is the only industry in Tasmania at the present time that has achieved tangible (quantifiable) benefits from Tasmania's GMO-free moratorium. However, this is more than offset by the inability to be able to grow GM canola.
- The market disadvantage created by Tasmania's GMO-free status is currently producing a net loss of around \$4 million per annum at the farm gate. This represents \$40 million of lost opportunity over the last ten years.
- The ability to supply non-GM canola to Japan has been reported as one of the major benefits of Tasmania's GMO-free status. However, other Australian regions where GM and non-GM crops coexist also supply this niche segment of the market. It was also found that this market was small and sporadic in nature.
- Price premiums in world canola for non-GM canola are either small or non-existent.
- Less than 5 per cent of the food and agricultural sector use Tasmania's GMO-free status to support their brand image and there is no evidence to suggest they derive a tangible benefit from doing so.
- The current market advantage that can be gained from the specific promotion of Tasmania's GMO-free status is likely to be very limited.

The consultant's report also assessed the impact of the Tasmanian moratoria against the four goals of Tasmania's Economic Development Plan. It is clear that maintaining the GMO moratorium in Tasmania is inconsistent with both the state's clean and green image, and economic development goals. The authors found:

- **Goal 1 - To support and grow businesses in Tasmania**
With the exception of the canola industry, Tasmania's GMO-free status has had little impact on the growth of businesses in Tasmania to date. While there are several companies that have increased business in Tasmania utilising the GMO moratorium to grow and sell non-GM products, the loss to other companies from losing a GM canola seed business has had a greater negative impact on business in Tasmania.
- **Goal 2 - To maximise Tasmania's economic potential in key sectors**
The sectors of the food industry in Tasmania currently identified for significant growth are dairy, salmon and soft fruit. None of these derive benefit from Tasmania's GMO-free status. The competitiveness of Tasmanian milk production may be negatively impacted by Tasmanian dairy farmers' inability to grow improved pasture species or grains. The capacity for industry to meet forecast milk demand would therefore be reduced.
- **Goal 3 - To improve the social and environmental sustainability of the economy**
The GMO moratorium has not had a significant impact on agriculture in Tasmania to date so it has had little ability to improve either social or environmental sustainability of the economy.
- **Goal 4 - To support and grow communities within regions**
Agriculture and food processing are two of the largest employment sectors in rural and regional communities across Tasmania. Growth in these sectors contributes greatly to growth in regional communities. The GMO moratorium has not impacted greatly on communities in regional Tasmania to date.

² Macquarie Franklin 2012, *Market advantage of Tasmania's GMO-free Status*, Devonport, Tasmania.

This report has shown that over 80 per cent of food products originating in Tasmania are sold within Australia, a market that is not focused on GMO issues. An increase in marketing of the GMO moratorium to the Australian market will not achieve growth in the agricultural and food sectors that support growth in communities and regions.

The findings of the Macquarie Franklin report clearly and unequivocally demonstrate that having a GMO moratorium is completely inappropriate for Tasmania.

2. ARE THERE NEW OR EMERGING OPPORTUNITIES IN GENE TECHNOLOGY THAT COULD BENEFIT TASMANIA'S PRIMARY INDUSTRIES, NOW OR IN THE FUTURE?

As a direct result of the GMO moratorium, Tasmania has missed out on ten years of opportunity to maximise the benefits of agricultural biotechnology in the state.

In Australia, growing GM cotton varieties has seen environmental benefits resulting from decreased insecticide use and changes in the type of insecticides and herbicides used. First grown in 1996, almost 100 per cent of Australia's cotton crop is now grown with GM varieties³. Cultivation of GM insect resistant cotton in conjunction with integrated pest management has directly led to a reduction in the amount of insecticide active ingredient used by up to 85 per cent^{4, 5}. This, in conjunction with industry stewardship practices, has greatly reduced the potential for chemical runoff into rivers in cotton growing regions of Australia⁶.

The types of chemical being used have also changed. Because of the 'in-built' insecticide in GM insect resistant cotton, insect control can be more targeted and specific meaning there is less of an impact on non-target organisms, thereby allowing beneficial (ie. predatory insects) to remain in the crop. It is worth noting that the insecticidal 'Bt' protein expressed in GM insect resistant cotton is also an approved input in organic agriculture. In-crop fuel use is also reduced as a result of fewer insecticide applications being required.

GM herbicide tolerant cotton has increased the adoption of minimum tillage practices and the replacement of some herbicides with less hazardous alternatives. By facilitating minimum tillage, GM herbicide tolerant cotton has reduced soil erosion, increased retention of soil moisture and increased soil carbon. Reducing the use of some residual herbicides, together with good industry stewardship, has decreased the potential for herbicide runoff into waterways⁷.

Economic and social benefits have also been realised through the adoption of GM crops in Australia. For example, in GM cotton growing regions, the incidence of on-farm workplace incidents has decreased as a result of reduced insecticide spraying and also the reduced need for hand weeding in cotton fields. Community perceptions of the Australian cotton industry have also markedly improved since GM cotton was first grown in 1996⁸. Cultivation of GM cotton varieties has allowed cotton farmers to spend less time on the tractor and more time with their families, an important social implication for rural Australia that should not be overlooked.

CropLife is cognisant that cotton is not a crop suited for the Tasmanian climate, but it is a fantastic example of how the right technology used the right way has both grown an Australian agricultural industry and saved it from near collapse.

³ Cotton Australia Cotton Fact File: Biotechnology <http://cottonaustralia.com.au/cotton-library/fact-sheets/cotton-fact-file-biotechnology> accessed 23 September 2013.

⁴ Hattersley P, Johnson H, Glover J, Foster M, Wesley V and Mewett O 2009. 'Plant Gene Technology: Improving the Productivity of Australian Agriculture'. Australian Government Bureau of Rural Sciences, Canberra.

⁵ Holtzapffel R, Mewett O, Wesley V and Hattersley P 2008. 'Genetically modified crops: tools for insect pest and weed control in cotton and canola'. Australian Government Bureau of Rural Sciences, Canberra.

⁶ *Ibid.*

⁷ Hattersley *et al.*, Op. cit.

⁸ Holtzapffel *et al.*, Op. cit.

The most appropriate current GM crop suited to Tasmanian farming systems is GM herbicide tolerant canola. Tasmanian growers are already growing non-GM herbicide tolerant canola varieties and the addition of GM varieties will simply be an extra tool in their weed control toolbox. Australia's Gene Technology Regulator has concluded that GM herbicide tolerant canola varieties pose no greater risks to human health or the environment than their conventionally bred herbicide tolerant counterparts.

The adoption of GM herbicide tolerant canola varieties in mainland Australia has also resulted in environmental benefits and increased environmental sustainability. For example, just as for those farmers growing GM herbicide tolerant cotton, cultivation of GM herbicide tolerant canola has allowed farmers in New South Wales, Victoria and Western Australia to use selective, targeted and lower hazard crop protection products.

Herbicide tolerant canola (both GM and non-GM) provides farmers with more effective weed control, particularly for those broad leaf weeds such as wild radish that are closely related to canola. Varieties of non-GM herbicide tolerant canola have been grown in Australia since 1993 (triazine tolerant) and 2000 (imidazolinone tolerant). The introduction of glyphosate tolerant GM canola merely adds another herbicide rotation option to farmers' weed control toolbox. Both non-GM and GM herbicide tolerant canola technologies have led the shift to no-till or conservation tillage systems with associated environmental benefits such as reduced soil erosion and increased soil water retention.

The agronomic benefits of GM (when compared to non-GM) herbicide tolerant canola include increasing the options for in-crop weed control, allowing herbicide rotations that address the risk of herbicide resistant weeds developing and increasing the yield in subsequent cereal crops, which could be adversely affected by herbicide carry over from the herbicides used in non-GM herbicide tolerant crops (triazines and imidazolinones).

The control of insect pests and weeds is a significant cost for Tasmanian farmers. While insect resistant GM cotton is not suitable for Tasmania, GM herbicide tolerant canola is a new tool that Tasmanian farmers could use as part of an Integrated Weed Management program to maintain the sustainability of weed control options in Tasmania.

GM crops currently under research and development in Australia will help Tasmanian farmers to combat environmental stresses such as drought, acid soils and salinity, which are being caused by changes in climatic conditions and previous non-sustainable farming practices. There is also considerable Australian research into GM traits that will bring health benefits to Tasmanian consumers, such as healthier starches and cooking oils modified to be lower in saturated fats and with improved cooking qualities.

The Global Socio-Economic and Environmental Impact of GM Crops

The most recent annual report on the global socio-economic and environmental impact of GM crops from the British consultancy firm PG Economics indicated continued considerable economic and environmental benefits to the farmers and general public in countries where GM crops are grown⁹ - **refer Attachments 1 and 2**. The report indicated that the net benefit at the farm level in 2011 from growing GM crops was US\$20 billion. For the 16 year period (1996-2011) covered by the report, the global farm income gain has been US\$98.2 billion. Australian GM cotton and canola farmers have realised a benefit of over US\$611 million in the period 1996-2011¹⁰.

If crop biotechnology had not been available to the 16.7 million farmers using the technology in 2011, maintaining global production at the 2011 levels would have required additional plantings equivalent to 33 per cent of the arable land in Australia. That's over 15 million hectares of forest and natural habitat saved by the use of crop biotechnology.¹¹

⁹ Brookes G and Barfoot P 2013. 'GM crops: global socio-economic and environmental impacts 1996-2011'. *PG Economics*, Dorchester, May.

¹⁰ Australian GM cotton farm income benefit US\$583.8 million 1996-2011; GM canola farm income benefit US\$27.5 million 2008-2011.

¹¹ Brookes G and Barfoot P 2013, *Op. Cit.*

The PG Economics report also notes that crop biotechnology has contributed to significantly reducing the release of greenhouse gas emissions from agricultural practices. This results from less fuel use and additional soil carbon storage from reduced tillage with GM crops. In 2011, this was equivalent to removing 23 billion kg of carbon dioxide from the atmosphere or equal to removing 10.2 million cars – 80 per cent of the cars registered in Australia – from the road for one year.¹²

The report notes that crop biotechnology has contributed to a significant reduction in the environmental impact associated with insecticide and herbicide use on the areas devoted to GM crops. From 1996-2011, the use of pesticides on the global GM crop area was reduced by 474 million kg of active ingredient (9 per cent total reduction) and the environmental impact associated with herbicide and insecticide use on GM crops, as measured by the Environmental Impact Quotient indicator, fell by 18.3 per cent¹³.

3. IS IT POSSIBLE FOR GM AND NON-GM CROPS TO CO-EXIST AND NOT AFFECT THE MARKETING OF TASMANIA'S PRODUCTS?

A true 'clean and green' economy must recognise that the variety in farming systems, environments and crops means that a 'one-size-fits-all' approach is neither logical nor effective. Measures that are environmentally sustainable in market gardening in peri-urban areas surrounding Hobart or Launceston may not be economically sustainable in a broadacre cropping/grazing system in other parts of the state. Any approach the Tasmanian Parliament takes when considering the GMO moratorium must recognise this reality.

Coexistence is the practice of growing crops with different quality characteristics or intended for different markets in the same vicinity without becoming comingled and thereby possibly compromising the economic value of both. Coexistence is based on the premise that all farmers should be free to cultivate the crops of their choice using the production system they prefer, be it using crop biotech, conventional or organic methods.

Coexistence of various production methods is not a new concept to the agricultural community. Farmers have practiced coexistence for generations in order to meet customer demands for different types of products. Breeders and farmers are accustomed to breeding and producing different crops such as bread and noodle wheat, feed and malting barley, and high- and zero-erucic acid canola alongside each other. They are also accustomed to producing certified seed to meet defined purity standards. This experience demonstrates that coexistence of a wide range of production methods is not a problem, provided technical and procedural guidelines are carefully followed and cooperation between neighbouring farms is encouraged. This applies equally to the use of modern crop protection and crop biotechnology products in farming systems.

Coexistence is not about environmental or health risks because it refers only to the use of crop biotechnologies or crop protection products that have been approved as safe for the environment and human health by Australian Government regulators. It is important to remember that industry routinely segregates and supplies to the market a wide variety of differentiated products.

For example, prior to the introduction of GM canola, industry was already segregating commodity canola from high oleic low linolenic (HOLL) canola, feed barley from malting barley, and many different grades of wheat. Introducing GM canola varieties into the Australian seed and grain supply chain did not represent significant difficulties for industry, as it was purely a case of 'business as usual', with simply an additional segregation and sampling and testing protocol added at the grain receival site.

Sampling and testing can be used to validate coexistence strategies and confirm industry has maintained the integrity of the products they supply to the market. Industry will segregate and supply products to meet customer preferences and will carry out sampling and testing both to verify that their systems are working properly and to provide customers with the assurance that products meet their specifications.

¹² *Ibid.*
¹³ *Ibid.*

All agricultural production systems should have an equal opportunity to contribute to the agri-food production system under free market conditions. Preference for one production system over another should not be the result of artificial, discriminatory and impractical public policy decisions made by state governments as is currently the case in Tasmania with the ban on commercial release of GMOs to the environment. Despite being in place for over ten years, there is absolutely no evidence that this ban has resulted in trade and/or marketing benefits for Tasmanian farmers, but rather and as indicated previously, it is likely to have resulted in opportunity costs of over \$40 million dollars. This is in stark contrast to mainland states that have generated over \$600 million in net farm gate benefits from GM crops since 1996, without compromising their ability to successfully market conventional or organic produce.

In 2007, the Australian grains industry established the 'Market Choice Framework' to manage the commercial introduction and coexistence of GM canola in the Australian seed and grain supply chain¹⁴. This framework could equally be applied to manage the introduction of commercial GMOs in Tasmania as it provides the necessary certainty and confidence to supply chain participants, consumers and the Tasmanian Government that GM products could be managed to meet market and customer requirements.

A snapshot of delivery prices at port for GM and non-GM canola in New South Wales, Victoria and Western Australia on 23 September 2013 indicates there is little or no price differential (or price premium) between the two different grades (**Refer Table 1**). Note that South Australia, which does not permit the commercial cultivation of GM canola, has the lowest receival price of any of the mainland states for its non-GM product.

Table 1: Delivery prices at port for GM and non-GM canola on 23 September 2013

Receival Site	Price for new season crop (2013/14) on 23 September 2013	
	CSO1-A (non-GM canola)	CSO1 (GM canola)
AWB – Delivered Newcastle	\$505	\$505
AWB – Delivered Footscray	\$495	\$495
GrainCorp – Kwinana	\$500	\$490
GrainCorp – Adelaide	\$475	N/A

4. WHAT IMPACT HAS THE MORATORIUM HAD IN THE RESEARCH AND DEVELOPMENT OF NEW PRODUCTS OR MARKETS?

Commercial production of transgenic crops is only authorised when environmental and consumer safety has been thoroughly demonstrated. In Australia, The Gene Technology Regulator is responsible for approving any dealings with GMOs. Food Standards Australia New Zealand (FSANZ) is required to approve any GM food ingredient and the Australian Pesticides and Veterinary Medicines Authority (APVMA) regulates those GM crops with inbuilt pest protection. The GM canola and GM cotton crops that are grown commercially in Australia have passed all of these regulatory assessments.

The *Gene Technology Act 2000* (Cth) was intended to establish a national system of regulating GMOs. Despite this intention, most states have implemented legislation to address 'marketing concerns' that are neither consistent nor transparent. This unclear path to market was well demonstrated in 2003 when the Office of the Gene Technology Regulator approved GM canola for commercial release and all the canola growing states implemented politically motivated moratoria on commercial cultivation of this crop. This led to years of delays, which reduced the management options for Australian farmers and created real uncertainty about the future of GM crops in Australia. State bans also cost food producers and

¹⁴ *Delivering Market Choice with GM canola*
[http://australianoilseeds.com/_data/assets/pdf_file/0019/2935/Delivering Market Choice with GM canola - FINAL - 1MB.pdf](http://australianoilseeds.com/_data/assets/pdf_file/0019/2935/Delivering_Market_Choice_with_GM_canola_-_FINAL_-_1MB.pdf) accessed 10 October 2013.

consumers, with one analysis concluding that nationally, the bans on GM canola cultivation cost \$157 million per annum¹⁵.

The Tasmanian Government has maintained a moratorium on commercial release of genetically modified organisms to the environment since 2001. Tasmania introduced the *Genetically Modified Organisms Control Act 2004* (Tas) to provide for the whole or any part of Tasmania to be declared a genetically modified organisms free area for marketing purposes. In 2008, the Tasmanian Government followed the advice of a Joint Select Committee, extending the moratorium until at least November 2014. This intervention means that there remains no clear path to market for the developers of GM crops in Tasmania, even when licence applicants have satisfied the requirements of the Commonwealth *Gene Technology Act* and it has been clearly demonstrated in other states that effects on trade are not only negligible, but in fact non-existent.

In Australia, GM crops are intensively studied and rigorously regulated. All regulation should be commensurate with the associated risk, cost and benefit to the community. CropLife supports the continued use of science-based risk assessment as the basis for sensible decision making. It is a key principle of good governance that governments should only intervene in a market where there is demonstrated market failure. However, state government moratoria on commercial production of GM crops have never identified any such failings.

The regulation of GM crops by state governments creates uncertainty that acts as a major disincentive for private investment and as a brake on technological innovation in the sector. This uncertainty is exacerbated by the fact that the moratorium legislation is often written so that it prevents the Minister from granting a licence unless certain conditions are met. It does not, however, compel the Minister to grant a licence if an application meets these same conditions. As a result, there remains a very real possibility that a company would invest significantly in bringing a technology to market in Australia with data to address all the federal and state regulations and still be unable to sell its product commercially.

This sort of significant disincentive to private investment in Australian agricultural biotechnology is counter-productive if Tasmania and indeed the rest of the nation, wishes to have a modern, sustainable and profitable agriculture sector in the future. Perhaps ironically, this situation is also a large threat to the otherwise highly successful public investments by state governments in developing GM crops.

The failure to implement a consistent national regulatory scheme has created crippling uncertainty for the agricultural biotechnology industry in Tasmania and completely undermined the effective regulation of GM crops. Both of these issues need to be addressed if Tasmania is to continue to have safe and affordable food choices available to everyone.

The Parliament of Tasmania should recognise that evidence to date has demonstrated that GM crops do not pose any unique risks to human health and the environment, nor to trade and marketing of Tasmania's primary produce, and consequently the Tasmanian moratorium on these crops is not commensurate with the risk.

5. SHOULD TASMANIA'S POLICY ALLOW FOR EXEMPTIONS TO A MORATORIUM?

Should the weight of overwhelming evidence of direct economic harm being caused by the GMO moratorium be ignored and the moratorium remain in place, then there should absolutely be exemptions for each and every GMO licenced for commercial release in Australia by the Gene Technology Regulator. The current Tasmanian Government policy allows for a permit to be granted for the commercial cultivation of plants intended for pharmaceutical purposes and not intended for use as food or feed. However, this provision has not been tested in practice. CropLife submits that this policy principle should be extended to allow for the cultivation of all GMOs licenced for commercial release by the Gene Technology Regulator.

There are three existing models in other Australian states to which exemptions to a GMO moratorium have been allowed (**Refer Box 1 below**).

¹⁵ Norton R.M., Roush, R.T., (2007) *Canola and Australian Farming Systems 2003-2007*.

BOX 1: Examples of exemptions to GMO moratoria in Australian mainland states¹⁶

New South Wales

The NSW Parliament passed the *Gene Technology (GM Crop Moratorium) Act 2003* (NSW) to prohibit the production of specified GM food crops (including GM canola, but excluding GM cotton). Based on the recommendations of an independent review in 2007, amendments were made to the Act to replace the moratorium Order process with a blanket moratorium and scheme for approving the commercial cultivation of licensed GM food plants, and established an Expert Committee to advise the NSW Minister for Primary Industries on applications by industry for the commercial cultivation of GM food crops. On 14 March 2008, following applications from industry, the NSW Primary Industries Minister announced that approval had been granted for the commercial production of licensed GM canola¹⁷ in NSW, having been satisfied that industry had adequately identified the requirements of key markets and could segregate GM and non-GM canola if required. The moratorium remains in place for the commercial production of all other GM food crops in NSW and was recently extended until 2021.

Western Australia

In Western Australia the *Genetically Modified Crops Free Areas Act 2003* (WA) prohibits the commercial cultivation of all GM crops in the state. On 25 January 2010 the WA Minister for Agriculture and Food announced that, “A person who cultivates genetically modified canola in Western Australia is exempt from the application of section 5(1) of the Act if the genetically modified canola is licensed for intentional release into the environment under the *Gene Technology Act 2000* (Cth)”.

South Australia

South Australia introduced the *Genetically Modified Crops Management Act 2004* (SA) to ensure the cultivation of GM crops was regulated in the state. The whole of the state has been designated a GM crops free area. Exemption notices have been issued under s6 of the Act to allow for the limited scale cultivation of GM food crops, including experimental crops in areas where the cultivation of GM crops is otherwise prohibited under ss 4 or 5 of the Act. The commercial cultivation of GM food crops remains prohibited in the state.

6. WHAT OTHER RELEVANT ISSUES SHOULD BE CONSIDERED IN THIS REVIEW?

Tasmanian industry is calling for the GMO moratorium to be lifted

If the GMO moratorium is to be renewed, it will almost certainly have a negative impact on the competitiveness of Tasmania’s milk production as Tasmanian dairy farmers will be denied access (for purely political reasons) to the improved grains and pastures available to their mainland competitors. This lack of access to improved feedstock that will be made available to mainland producers will significantly restrict the ability of the Tasmanian dairy industry to increase their productivity to meet forecast milk demand. Given that the vast majority of the industry’s product is not badged as “Tasmanian” in its final form, CropLife questions where the economic and marketing advantage for the State lies in denying dairy farmers access to the newest and most innovative technology.

The Tasmanian poppy industry has also publicly stated that the GMO ban could lead to Tasmania’s poppy industry losing out to states or countries that took advantage of the potential of GM poppies.

¹⁶ Mewett et al. (2008) *Maintaining product integrity in the Australian seed and grain supply chain – the role of sampling and testing for GM events*, Australian Government Bureau of Rural Sciences, Canberra.

¹⁷ ‘**licensed GM canola**’ means GM canola in respect of which a GMO licence is in force under the *Gene Technology Act 2000* (Cth) authorising dealings with the GM canola that are inherently necessary for its commercial cultivation.

The Government's GMO policy is inconsistent with its moratorium legislation

Currently, the *Genetically Modified Organisms Control Act 2004* (Tas) gives a GMO the same meaning as in the *Gene Technology Act 2000* (Cth). This effectively means that all GMOs captured under the Commonwealth Act are covered by the Tasmanian moratorium, including those intended for use in medical and industrial purposes.

However, the Tasmanian Government's *Policy Statement: Gene Technology and Tasmanian Primary Industries 2009-2014* states that "the policy excludes gene technology used in contained research, or production of, human medicines or therapeutics, and closed loop industrial processes".

Clearly, the intent of the policy is not captured by the existing legislation (and vice versa), and CropLife recommends that as an outcome of this review, the two are better aligned, and the potential impact of the moratorium on the competitiveness of Tasmania's medical and industrial biotechnology industries better recognised.

The safety of crop biotechnology products has been continually reaffirmed over time

A significant number of peer-reviewed scientific research papers have been published that describe the results of biosafety research on GM crops. The overwhelming weight of scientific consensus in these papers confirms that approved genetically modified crops are as safe as their conventional counterparts¹⁸.

GM crops have been grown and consumed for more than 17 years and people around the world have eaten over 2 trillion meals containing biotech-derived foods or ingredients. There are no substantiated nor credible scientific reports of any food safety issues related to the consumption of GM crops.

Nutritional benefits of biotech crops

Crop biotechnology is being used to develop nutrient-dense varieties of staple crops that could be grown for a fraction of the recurrent estimated annual costs of supplementation programs in developing countries and could reach far more people. The nutritional quality of staple foods can be substantially improved using transgenic methods compared to what can be accomplished using traditional breeding.

For example, Golden Rice (with elevated levels of pro-Vitamin A) is expected to be available in 2013 in the Philippines and probably followed by Bangladesh, Indonesia and Vietnam. In developing countries, 200-300 million children of preschool age are at risk of Vitamin A deficiency, which is the single most important cause of childhood blindness in developing countries. Every year, about half a million children go blind as a result of Vitamin A deficiency and 70 per cent of those die within a year of losing their sight.

Golden Rice could have been available and saving children's lives for many years were it not for the ongoing activism of anti-humanitarian organisations, who first claimed the elevated levels of pro-Vitamin A in the modified rice were toxic. When this was shown to be patently untrue, these activist organisations changed tack and claimed the level of pro-Vitamin A in the rice was in fact too *low* to have any meaningful biologic effect. This activism recently culminated in the criminal destruction of Golden Rice field trials in the Philippines.

Biotechnology is also being used to produce vegetable oils with low saturated fats and properly balanced essential fatty acids, which are associated with reducing the risk of heart disease and stroke, important for brain function and essential for growth and development of infants.

¹⁸ See list of studies at <http://www.biofortified.org/genera/studies-for-genera/> accessed 23 September 2013

CONCLUSION

Maintaining the productivity, profitability and innovativeness of agricultural production systems will not be achieved by limiting the options for farmers to manage their businesses. Each individual farm faces specific challenges in terms of climate, soil type, farming system, demography and economy. These circumstances all have an impact upon the choices available to farmers to manage their farms. For example, the challenges faced by a wine grape grower in the Tamar Valley will be different to a broadacre grains farmer in another part of the state.

There is a wide variety of farming systems and circumstances throughout Tasmania. A true 'clean and green' farming system will only be delivered by enabling farmers to make management choices and decisions that best suit their individual circumstances. For some farmers, this may mean adopting organic production systems to leverage high-value specialty markets. For other farmers this may mean adopting innovative new agricultural chemical products or genetically modified crops for agronomic and environmental purposes. Coexistence of farming systems is the key.

Ultimately, it is farmers that best understand the pressures faced by a particular farm. Regulatory policy in Tasmania to support productive, profitable and innovative agriculture must continue to allow farmers to make decisions in the best interests of their own business. This will mean allowing farmers to adopt any one of a range of farming systems, or a combination of them.

Over ten years, there has been no evidence that the GMO moratorium has caused anything but a trade and marketing disadvantage to the state. Furthermore, there is absolutely no evidence that this ongoing economic loss is likely to change were the GMO moratorium to be extended following this review.

Tasmania's primary production sector is being significantly disadvantaged through the denial of access to the newest and most innovative agricultural technologies. Technologies that not only could help the profitability of Tasmanian farmers but also allow them to farm more sustainably, which in turn would only enhance Tasmania's 'clean and green' marketing profile.

The evidence of the benefit of GM crops is both overwhelming and indisputable. It demonstrates that GM crops could offer all of the agronomic, environmental, social, trade and marketing benefits that are sought by Tasmanian primary producers.

Accordingly, CropLife strongly recommends that the moratorium not be renewed and that it be allowed to expire in November 2014.

The global income and production effects of genetically modified (GM) crops 1996–2011

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Keywords: yield, cost, income, production, genetically modified crops

A key part of any assessment of the global value of crop biotechnology in agriculture is an examination of its economic impact at the farm level. This paper follows earlier annual studies which examined economic impacts on yields, key costs of production, direct farm income and effects and impacts on the production base of the four main crops of soybeans, corn, cotton and canola. The commercialization of genetically modified (GM) crops has continued to occur at a rapid rate, with important changes in both the overall level of adoption and impact occurring in 2011. This annual updated analysis shows that there have been very significant net economic benefits at the farm level amounting to \$19.8 billion in 2011 and \$98.2 billion for the 16 year period (in nominal terms). The majority (51.2%) of these gains went to farmers in developing countries. GM technology have also made important contributions to increasing global production levels of the four main crops, having added 110 million tonnes and 195 million tonnes respectively, to the global production of soybeans and maize since the introduction of the technology in the mid-1990s.

Introduction

Although the first commercial genetically modified (GM) crops were planted in 1994 (tomatoes), 1996 was the first year in which a significant area of crops containing GM traits was planted (1.66 million hectares). Since then there has been a significant increase in plantings and by 2011, the global planted area reached over 148 million hectares.

Since the mid-1990s, there have been many papers assessing the economic impacts associated with the adoption of this technology, at the farm level. The authors of this paper have, since 2005, engaged in an annual exercise to aggregate and update the sum of these various studies, and where possible and appropriate, to supplement this with new analysis. The aim of this has been to provide an up to date and as accurate as possible assessment of some of the key economic impacts associated with the global adoption of GM crops. It is also hoped the analysis contributes to greater understanding of the impact of this technology and facilitates more informed decision making, especially in countries where crop biotechnology is currently not permitted.

Therefore, integrating the data for 2011 into the context of earlier developments, this study updates the findings of earlier analysis into the global economic impact of GM crops since their commercial introduction in 1996. Earlier analysis by the current authors has been published in various journals, including *AgbioForum*,¹ the *International Journal of Biotechnology*² and *GM Crops*.³ The methodology and analytical procedures in this present discussion are unchanged to allow a direct comparison of the new with earlier data. Readers should however, note that some

data presented in this paper are not directly comparable with data presented in previous analysis because the current paper takes into account the availability of new data and analysis (including revisions to data for earlier years).

In order to save readers the chore of consulting these earlier papers for details of the methodology and arguments, the journal's editors have agreed that these elements may again be included in full in this updated paper.

The analysis concentrates on farm income effects because this is a primary driver of adoption among farmers (both large commercial and small-scale subsistence). It also quantifies the (net) production impact of the technology. The authors recognize that an economic assessment could examine a broader range of potential impacts (e.g., on labor usage, households, local communities and economies).

However, these are not included because undertaking such an exercise would add considerably to the length of the paper and an economic assessment of wider economic impacts would probably merit a separate assessment in its own right.

Results and Discussion

HT crops. The primary impact of GM HT (largely tolerant to the broad spectrum herbicide glyphosate) technology has been to provide more cost effective (less expensive) and easier weed control for farmers. Nevertheless, some users of this technology have also derived higher yields from better weed control (relative to weed control obtained from conventional technology). The magnitude of these impacts varies by country and year and is

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mainly due to prevailing costs of different herbicides used in GM HT systems vs. conventional alternatives, the mix and amount of herbicides applied, the cost farmers pay for accessing the GM HT technology and levels of weed problems. The following important factors affecting the level of cost savings achieved in recent years should, however, be noted:

- In the period 2008–2009, the average cost associated with the use of GM HT technology globally increased relative to earlier years because of the significant increase in the global price of glyphosate relative to changes in the price of other herbicides commonly used on conventional crops. This has abated since 2009 with a decline in the price of glyphosate to previous historic trend levels;

- The amount farmers pay for use of the technology varies by country. Pricing of technology (all forms of seed and crop protection technology) varies according to the level of benefit that farmers are likely to derive from it. In addition, it is influenced by intellectual property rights (patent protection, plant breeders' rights and rules relating to use of farm-saved seed). In countries with weaker intellectual property rights, the cost of the technology tends to be lower than in countries where there are stronger rights. This is examined further in "Aggregated (global level) impacts" below;

- Where GM HT crops (tolerant to glyphosate) have been widely grown, some incidence of weed resistance to glyphosate has occurred. This has been attributed to how glyphosate was used; because of its broad-spectrum post-emergence activity, it was often used as the sole method of weed control. This approach to weed control put tremendous selection pressure on weeds and as a result contributed to the evolution of weed populations predominated by resistant individual weeds. It should, however, be noted that there are hundreds of resistant weed species confirmed in the International Survey of Herbicide Resistant Weeds (www.weedscience.org). Worldwide, there are 24 weed species that are currently (accessed February 2013) resistant to glyphosate, compared with 129 weed species resistant to ALS herbicides and 70 weed species resistant to triazine herbicides. In addition, it should be noted that the adoption of GM HT technology has played a major role in facilitating the adoption of no and reduced tillage production techniques in North and South America. This has also probably contributed to the emergence of weeds resistant to herbicides like glyphosate and to weed shifts toward those weed species that are not well controlled by glyphosate. As a result, growers of GM HT crops are increasingly being advised to include other herbicides (with different and complementary modes of action) in combination with glyphosate in their integrated weed management systems. At the macro level, these changes have already begun to influence the mix, total amount, cost and overall profile of herbicides applied to GM HT crops. Relative to the conventional alternative, however, the economic impact of the GM HT crop use has continued to offer important advantages. Also, many of the herbicides used in conventional production systems had significant resistance issues themselves in the mid-1990s. This was, for example, one of the reasons why glyphosate tolerant soybeans were rapidly adopted, as glyphosate provided good control of these weeds. If the GM HT technology

was no longer delivering net economic benefits, it is likely that farmers around the world would have significantly reduced their adoption of this technology in favor of conventional alternatives. The fact that GM HT global crop adoption levels have not fallen in recent years suggests that farmers must be continuing to derive important economic benefits from using the technology.

These points are further illustrated in the analysis below.

GM HT soybeans. The average impacts on farm level profitability from using this technology are summarized in **Table 1**. The main farm level gain experienced has been a reduction in the cost of production, mainly through reduced expenditure on weed control (herbicides). Not surprisingly, where yield gains have occurred from improvements in the level of weed control, the average farm income gain has tended to be higher, in countries such as Romania, Mexico and Bolivia. A second generation of GM HT soybeans became available to commercial soybean growers in the US and Canada in 2009. This technology offered the same tolerance to glyphosate as the first generation (and the same cost saving) but with higher yielding potential. The realization of this potential is shown in the higher average farm income benefits (**Table 1**).

GM HT soybeans have also facilitated the adoption of no tillage production systems, shortening the production cycle. This advantage has enabled many farmers in South America to plant a crop of soybeans immediately after a wheat crop in the same growing season. This second crop, additional to traditional soybean production, has added considerably to farm incomes and to the volumes of soybean production in countries such as Argentina and Paraguay.

Overall, in 2011, GM HT technology in soybeans has boosted farm incomes by \$3.89 billion and since 1996 has delivered \$32.2 billion of extra farm income. Of the total cumulative farm income gains from using GM HT soybeans, \$10.6 billion (33%) has been due to yield gains/second crop benefits and the balance, 67%, has been due to cost savings.

GM HT maize. The adoption of GM HT maize has mainly resulted in lower costs of production, although yield gains from improved weed control have arisen in Argentina, Brazil and the Philippines (**Table 2**).

In 2011, the total global farm income gain from using this technology was \$1.54 billion, with the cumulative gain over the period 1996–2011 being \$4.21 billion. Within this, \$0.76 billion (18%) was due to yield gains and the rest derived from lower costs of production.

GM HT cotton. The use of GM HT cotton delivered a net farm income gain of about \$167 million in 2011. Over the 1996–2011 period, the total farm income benefit was \$1.22 billion. As with other GM HT traits, these farm income gains have mainly arisen from cost savings (87% of the total gains), although there have been some yield gains in Brazil, Mexico and Colombia (**Table 3**).

Other HT crops. GM HT canola (tolerant to glyphosate or glufosinate) has been grown in Canada, the US and more recently Australia, while GM HT sugar beet is grown in the US and Canada. The farm income impacts associated with the adoption of these technologies are summarized in **Table 4**. In both

Table 1. GM HT soybeans: summary of average farm level economic impacts 1996–2011 (\$/hectare)

Country	Cost of technology	Average farm income benefit (after deduction of cost of technology)	Type of benefit	References
1st generation GM HT soybeans				
Romania (to 2006 only)	50–60	104	Small cost savings of about \$9/ha, balance due to yield gains of +13% to +31%	Brookes (2005 ⁴) Monsanto Romania (2007 ⁵)
Argentina	2–4	23 plus second crop benefits of 193	Cost savings plus second crop gains	Qaim and Traxler (2005 ⁶) Trigo and CAP (2006 ⁷) and updated from 2008 to reflect herbicide price changes
Brazil	16–25	37	Cost savings	Parana Department of Agriculture (2004 ⁸) Galveo (2010, ⁹ 2012 ¹⁰)
USA	15–39	38	Cost savings	Marra et al. (2002 ¹¹) Carpenter and Gianessi (2002 ¹²) Sankala and Blumenthal (2003 ¹³ and 2006 ¹⁴) Johnson and Strom (2008 ¹⁵) And updated to reflect herbicide price and common product usage
Canada	20–40	20	Cost savings	George Morris Center (2004 ¹⁶) and updated to reflect herbicide price and common product usage
Paraguay	4–10	18 plus second crop benefits of 193	Cost savings	Based on Argentina as no country-specific analysis identified. Impacts confirmed by industry sources and herbicide costs updated 2009 onwards from herbicide usage survey data (AMIS Global)
Uruguay	2–4	19	Cost savings	Based on Argentina as no country-specific analysis identified. Impacts confirmed by industry sources and herbicide costs updated 2009 onwards from herbicide usage survey data (AMIS Global)
South Africa	20–30	4	Cost savings	Based on Argentina as no country-specific analysis identified. Impacts confirmed by industry sources and herbicide costs updated 2009 onwards from herbicide usage survey data (AMIS Global)
Mexico	20–25	49	Cost savings plus yield gain in range of +2% to +13%	Monsanto unpublished annual monitoring reports and personal communications
Bolivia	3–4	81	Cost savings plus yield gain of +15%	Fernandez W et al. (2009 ¹⁷)
2ndt generation GM HT soybeans				
US and Canada	50–65	120	Cost savings as first generation plus yield gains in range of +5% to +10%	As first generation GM HT soybeans plus farm level survey data from Monsanto USA

Notes: (1) Romania stopped growing GM HT soybeans in 2007 after joining the European Union, where the trait is not approved for planting. (2) The range in values for cost of technology relates to annual changes in the average cost paid by farmers. It varies for reasons such as the price of the technology set by seed companies, exchange rates, average seed rates and values identified in different studies. (3) For additional details of how impacts have been estimated, see examples in **Supplemental Materials, Appendix 1**.

cases, the main farm income benefit has derived from yield gains. In 2011, the total global income gain from the adoption of GM HT technology was \$479 million and cumulatively since 1996, it was been \$3.31 billion.

GM IR crops. The main way in which these technologies have impacted on farm incomes has been through lowering the levels of pest damage and hence delivering higher yields (Table 5).

The greatest improvement in yields has occurred in developing countries, where conventional methods of pest control have typically been least effective (e.g., reasons such as less well developed extension and advisory services, lack of access to finance to fund use of crop protection application equipment and products), with any cost savings associated with reduced insecticide use being mostly found in developed countries. These effects can

Table 2. GM HT maize: summary of average farm level economic impacts 1996–2011 (\$/hectare)

Country	Cost of technology	Average farm income benefit (after deduction of cost of technology)	Type of benefit	References
USA	15–30	20	Cost savings	Carpenter and Gianessi (2002 ¹²) Sankala and Blumenthal (2003 ¹³ and 2006 ¹⁴) Johnson and Strom (2008 ¹⁵) Also updated to reflect herbicide price and common product usage
Canada	17–35	11	Cost savings	Monsanto Canada (personal communications) and updated annually since 2008 to reflect changes in herbicide prices and usage
Argentina	16–20	84	Cost savings plus yield gains over 10% and higher in some regions	Personal communication from Monsanto Argentina, Grupo CEO and updated since 2008 to reflect changes in herbicide prices and usage
South Africa	10–18	1	Cost savings	Personal communication from Monsanto South Africa and updated since 2008 to reflect changes in herbicide prices and usage
Brazil	17–20	77	Cost savings plus yield gains of +1% to +4%	Galveo (2010 ⁹ and 2012 ¹⁰)
Colombia	38–40	17	Cost savings	Mendez et al. (2011 ¹⁸)
Philippines	24–29	47	Cost savings plus yield gains of +5% to +15%	Gonsales et al. (2009 ¹⁹) Monsanto Philippines (personal communications) Updated since 2010 to reflect changes in herbicide prices and usage

(1) The range in values for cost of technology relates to annual changes in the average cost paid by farmers. It varies for reasons such as the price of the technology set by seed companies, exchange rates, average seed rates and values identified in different studies. (2) For additional details of how impacts have been estimated, see examples in **Supplemental Materials, Appendix 1**.

be seen in the level of farm income gains that have arisen from the adoption of these technologies, as shown in **Table 6**.

At the aggregate level, the global farm income gains from using GM IR maize and cotton in 2011 were \$7.1 billion and \$6.56 billion respectively. Cumulatively since 1996, the gains have been \$25.8 billion for GM IR maize and \$31.3 billion for GM IR cotton.

Aggregated (global level) impacts. At the global level, GM technology has had a significant positive impact on farm income, with in 2011, the direct global farm income benefit being \$19.8 billion. This is equivalent to having added 6.2% to the value of global production of the four main crops of soybeans, maize, canola and cotton. Since 1996, farm incomes have increased by \$98.2 billion.

At the country level, US farmers have been the largest beneficiaries of higher incomes, realizing over \$43.6 billion in extra income between 1996 and 2011. This is not surprising given that US farmers were first to make widespread use of GM crop technology and for several years the GM adoption levels in all four US crops have been in excess of 80%. Important farm income benefits (\$22 billion) have occurred in South America (Argentina, Bolivia, Brazil, Colombia, Paraguay and Uruguay), mostly from GM technology in soybeans and maize. GM IR cotton has also been responsible for an additional \$25.7 billion additional income for cotton farmers in China and India.

In 2011, 51.2% of the farm income benefits were earned by farmers in developing countries. The vast majority of these gains have been from GM IR cotton and GM HT soybeans. Over the 16 years, 1996–2011, the cumulative farm income gain derived by developing country farmers was \$49.63 billion, equal to 50.5% of the total farm income during this period.

The cost to farmers for accessing GM technology, across the four main crops, in 2011, was equal to 21% of the total value of technology gains. This is defined as the farm income gains referred to above plus the cost of the technology payable to the seed supply chain. Readers should note that the cost of the technology accrues to the seed supply chain including sellers of seed to farmers, seed multipliers, plant breeders, distributors and the GM technology providers.

In developing countries, the total cost was equal to 14% of total technology gains compared with 28% in developed countries. While circumstances vary between countries, the higher share of total technology gains accounted for by farm income in developing countries relative to developed countries reflects factors such as weaker provision and enforcement of intellectual property rights in developing countries and the higher average level of farm income gain per hectare derived by farmers in developing countries compared with those in developed countries.

Crop production effects. Based on the yield impacts used in the direct farm income benefit calculations above and taking account of the second soybean crop facilitation in South America,

Table 3. GM HT cotton summary of average farm level economic impacts 1996–2011 (\$/hectare)

Country	Cost of technology	Average farm income benefit (after deduction of cost of technology)	Type of benefit	References
USA	13–82	22	Cost savings	Carpenter and Gianessi (2002 ¹²) Sankala and Blumenthal (2003 ¹³ and 2006 ¹⁴) Johnson and Strom (2008 ¹⁵) Also updated to reflect herbicide price and common product usage
South Africa	15–32	33	Cost savings	Personal communication from Monsanto South Africa and updated since 2008 to reflect changes in herbicide prices and usage
Australia	32–131	27	Cost savings	Doyle et al. (2003 ²⁰) Monsanto Australia (personal communications) and updated to reflect changes in herbicide usage and prices
Argentina	17–30	39	Cost savings	Personal communication from Monsanto Argentina, Grupo CEO and updated since 2008 to reflect changes in herbicide prices and usage
Brazil	45–52	118	Cost savings plus yield gains of +2% to +4%	Galveo (2010 ⁹ and 2012 ¹⁰)
Mexico	29–66	132	Cost savings plus yield gains of +3% to +18%	Monsanto Mexico annual monitoring reports ²¹ and personal communications
Colombia	96–184	100	Cost savings plus yield gains of +4%	Monsanto Colombia annual personal communications

(1) The range in values for cost of technology relates to annual changes in the average cost paid by farmers. It varies for reasons such as the price of the technology set by seed companies, exchange rates, average seed rates, the nature and effectiveness of the technology (eg, second generation 'Flex' cotton offered more flexible and cost effective weed control than the earlier first generation of HT technology) and values identified in different studies. (2) For additional details of how impacts have been estimated, see examples in **Supplemental Materials, Appendix 1**.

GM crops have added important volumes to global production of corn, cotton, canola and soybeans since 1996 (Table 7).

The GM IR traits, used in maize and cotton, have accounted for 97.3% of the additional maize production and 99.4% of the additional cotton production. Positive yield impacts from the use of this technology have occurred in all user countries (except for GM IR cotton in Australia where the levels of *Heliothis* sp (boll and bud worm pests) pest control previously obtained with intensive insecticide use were very good. The main benefit and reason for adoption of this technology in Australia has arisen from significant cost savings and the associated environmental gains from reduced insecticide use) when compared with average yields derived from crops using conventional technology (such as application of insecticides and seed treatments). The average yield impact across the total area planted to these traits over the 16 y since 1996 has been +10.1% for maize and +15.8% for cotton.

As indicated earlier, the primary impact of GM HT technology has been to provide more cost effective (less expensive) and easier weed control, as opposed to improving yields, the improved weed control has, nevertheless, delivered higher yields in some countries. The main source of additional production from this technology has been via the facilitation of no tillage production systems, shortening the production cycle and how it has enabled many farmers in South America to plant a crop of soybeans immediately after a wheat crop in the same growing season. This second crop, additional to traditional soybean production, has added 106.4 million tonnes to soybean production in Argentina

and Paraguay between 1996 and 2011 (accounting for 96.6% of the total GM-related additional soybean production).

Methodology

The report is based on extensive analysis of existing farm level impact data for GM crops, much of which can be found in peer reviewed literature. While primary data for impacts of commercial cultivation were not available for every crop, in every year and for each country, a substantial body of representative research and analysis is available and this has been used as the basis for the analysis presented. In addition, the authors have undertaken their own analysis of the impact of some trait-crop combinations in some countries [notably GM herbicide tolerant (HT) traits in North and South America] based on herbicide usage and cost data over the last five years.

As indicated in earlier papers, the economic impact of this technology at the farm level varies widely, both between and within regions or countries. Therefore the measurement of impact is considered on a case by case basis in terms of crop and trait combinations and is based on the average performance and impact recorded in different crops by the studies reviewed. Where more than one piece of relevant research (e.g., on the impact of using a GM trait on the yield of a crop in one country in a particular year) has been identified, the findings used in this analysis reflect the authors assessment of which research is most likely to be reasonably representative of impact in the country in that year. For example, there are many papers on the impact of GM insect resistant (IR) cotton in India. Few of these are reasonably

Table 4. Other GM HT crops summary of average farm level economic impacts 1996–2011 (\$/hectare)

Country	Cost of technology	Average farm income benefit (after deduction of cost of technology)	Type of benefit	References
GM HT canola				
US	12–33	59	Mostly yield gains of +1% to +12% (especially Invigor canola)	Sankala and Blumenthal (2003 ¹³ and 2006 ¹⁴) Johnson and Strom (2008 ¹⁵) And updated to reflect herbicide price and common product usage
Canada	18–32	49	Mostly yield gains of +3% to +12% (especially Invigor canola)	Canola Council (2001 ²²) Gusta et al. (2009 ²³) and updated to reflect herbicide price changes and seed variety trial data (on yields)
Australia	32–41	61	Mostly yield gains of +16% to +22% (where replacing triazine tolerant canola)	Monsanto Australia (2009 ²⁴)
GM HT sugar beet				
US and Canada	130–151	118	Mostly yield gains of +3% to +13%	Kniss (2008 ²⁵) Khan (2008 ²⁶) Armstrong JJQ and Sprague C (2010 ²⁷) Annual updates of herbicide price and usage data

Notes: (1) In Australia, one of the most popular type of production has been canola tolerant to the triazine group of herbicides (tolerance derived from non GM techniques). It is relative to this form of canola that the main farm income benefits of GM HT (to glyphosate) canola has occurred. (2) InVigor' hybrid vigour canola (tolerant to the herbicide glufosinate) is higher yielding than conventional or other GM HT canola and derives this additional vigour from GM techniques. (3) The range in values for cost of technology relates to annual changes in the average cost paid by farmers. It varies for reasons such as the price of the technology set by seed companies, exchange rates, average seed rates and values identified in different studies. (4) For additional details of how impacts have been estimated, see examples in **Supplemental Materials, Appendix 1**.

representative of cotton growing across the country, with many papers based on small scale, local and unrepresentative samples of cotton farmers. Only the reasonably representative research has been drawn on for use in this paper—readers should consult the references to this paper to identify the sources used.

This approach may still both, overstate, or understate, the impact of GM technology for some trait, crop and country combinations, especially in cases where the technology has provided yield enhancements. However, as impact data for every trait, crop, location and year data are not available, the authors have had to extrapolate available impact data from identified studies to years for which no data are available. In addition, if the only studies available took place several years ago, there is a risk that basing current assessments on comparisons from several years ago may not adequately reflect the nature of currently available alternative (non GM seed or crop protection) technology. The authors acknowledge that these factors represent potential methodological weaknesses. Therefore to reduce the possibilities of over or understating impact due to these factors, the analysis:

- Directly applies impacts identified from the literature to the years that have been studied. As a result, the impacts used vary in many cases according to the findings of literature covering different years. Examples where such data are available include the impact of GM insect resistant (IR) cotton: in India [see Bennett R et al. (2004⁵¹), IMRB (2006)⁵² and IMRB (2007)],⁵³ in Mexico [see Traxler et al. (2001)³⁹ and Monsanto Mexico (2005, 2007,

2008)²¹] and in the US [see Sankala and Blumenthal (2003¹³ and 2006¹⁴), Mullins and Hudson (2004)⁶⁷]. Hence, the analysis takes into account variation in the impact of the technology on yield according to its effectiveness in dealing with (annual) fluctuations in pest and weed infestation levels;

- Uses current farm level crop prices and bases any yield impacts on (adjusted—see below) current average yields. In this way a degree of dynamic has been introduced into the analysis that would, otherwise, be missing if constant prices and average yields identified in year-specific studies had been used;

- As indicated above, it includes some changes and updates to the impact assumptions identified in the literature based on new papers, annual consultation with local sources (analysts, industry representatives, databases of crop protection usage and prices) and some “own analysis” of changes in crop protection usage and prices;

- Adjusts downwards the average base yield (in cases where GM technology has been identified as having delivered yield improvements) on which the yield enhancement has been applied. In this way, the impact on total production is not overstated.

Detailed examples of how the methodology has been applied to the calculation of the 2011 years results are presented in **Supplemental Materials, Appendix 1**. **Supplemental Materials, Appendix 2** also provides details of the impacts and assumptions applied and their sources.

Table 5. Average (%) yield gains GM IR cotton and maize 1996–2011

	Maize insect resistance to corn boring pests	Maize insect resistance to rootworm pests	Cotton insect resistance	References
US	7.0	5.0	9.8	Carpenter and Gianessi (2002 ¹²) Marra et al. (2002 ¹¹) Sankala and Blumenthal (2003 ¹³ and 2006 ¹⁴) Hutchison et al. (2010 ²⁸) Rice (2004 ²⁹)
China	N/a	N/a	10.0	Pray et al. (2002 ³⁰) Monsanto China (personal communications)
South Africa	11.8	N/a	24.0	Gouse et al. (2005, ³¹ 2006a ³² and 2006b ³³) Van der Wald (2010 ³⁴) Ismael et al. (2002 ³⁵) Kirsten et al. (2002 ³⁶) James (2003 ³⁷)
Honduras		N/a	N/a	Falk Zepeda et al. (2009 ³⁸)
Mexico	N/a	N/a	10.0	Traxler et al. (2001 ³⁹) Monsanto Mexico annual cotton monitoring reports ²¹
Argentina	6.4	N/a	30.0	Trigo (2002 ⁴⁰) Trigo and Cap (2006 ⁷) Qaim and De Janvry (2002 ⁴¹ and 2005 ⁴²) Elena (2001 ⁴³)
Philippines	18.6	N/a	N/a	Gonsales (2005 ⁴⁴) Yorobe (2004 ⁴⁵) Ramon (2005 ⁴⁶)
Spain	9.9	N/a	N/a	Brookes (2003 ⁴⁷ and 2008 ⁴⁸) Gomez-Barbero and Rodriguez-Corejo (2006 ⁴⁹) Riesgo et al. (2012 ⁵⁰)
Uruguay	5.6	N/a	N/a	As Argentina (no country-specific studies available and industry sources estimate similar impacts as in Argentina)
India	N/a	N/a	38.0	Bennett et al. (2004 ⁵¹) IMRB (2006 ⁵² and 2007 ⁵³) Herring and Rao (2012 ⁵⁴)
Colombia	21.0	N/a	10.0	Mendez et al. (2011 ¹⁸) Zambrano et al. (2009 ⁵⁵)
Canada	7.0	5.0	N/a	As US (no country-specific studies available and industry sources estimate similar impacts as in the US)
Burkina Faso	N/a	N/a	18.0	Vitale J et al. (2008 ⁵⁶ and 2010 ⁵⁷)
Brazil	12.0	N/a	-0.3	Galveo (2009, ⁵⁸ 2010 ¹⁰ and 2012 ⁵⁹) Monsanto Brazil (2008 ⁶⁰)
Pakistan	N/a	N/a	13.0	Nazli et al. (2010 ⁶¹)
Burma	N/a	N/a	31.0	USDA (2011 ⁶²)
Australia	N/a	N/a	Nil	Doyle (2005 ⁶³) James (2002 ⁶⁴) CSIRO (2005 ⁶⁵) Fitt (2001 ⁶⁶)

Notes: N/a = not applicable.

Table 6. GM IR crops: average farm income benefit 1996–2011 (\$/hectare)

Country	GM IR maize: cost of technology	GM IR maize (average farm income benefit (after deduction of cost of technology))	GM IR cotton: cost of technology	GM IR cotton (average farm income benefit (after deduction of cost of technology))
US	17–32 IRCB, 22–42 IR CRW	80 IRCB, 86 IR CRW	26–58	80
Canada	17–25 IRCB, 22–42 IR CRW	82 IRCB 99 IR CRW	N/a	N/a
Argentina	20–33	20	27–86	177
Philippines	30–39	88	N/a	N/a
South Africa	8–17	78	14–50	185
Spain	17–51	156	N/a	N/a
Uruguay	20–33	20	N/a	N/a
Honduras	30–31	86	N/a	N/a
Colombia	43–48	233	50–172	67
Brazil	54–69	12	34–52	15
China	N/a	N/a	38–60	341
Australia	N/a	N/a	85–299	193
Mexico	N/a	N/a	48–59	190
India	N/a	N/a	17–54	267
Burkina Faso	N/a	N/a	51–54	157
Burma	N/a	N/a	17–20	349
Pakistan	N/a	N/a	14–15	47
Average across all user countries		75		244

Notes: (1) GM IR maize all are IRCB unless stated (IRCB = insect resistance to corn boring pests), IRCRW = insect resistance to corn rootworm. (2) The range in values for cost of technology relates to annual changes in the average cost paid by farmers. It varies for reasons such as the price of the technology set by seed companies, the nature and effectiveness of the technology (eg, second generation ‘Bollgard’ cotton offered protection against a wider range of pests than the earlier first generation of ‘Bollgard’ technology), exchange rates, average seed rates and values identified in different studies. (3) Colombia, GM IR maize are farm level trials only. (4) Average across all countries is a weighted average based on areas planted in each user country. (5) n/a = not applicable.

Other aspects of the methodology used to estimate the impact on direct farm income are as follows:

- Where stacked traits have been used, the individual trait components were analyzed separately to ensure estimates of all traits were calculated. This is possible because the non-stacked seed has been (and in many cases continues to be) available and used by farmers and there are studies that have assessed trait-specific impacts;
- All values presented are nominal for the year shown and the base currency used is the US dollar. All financial impacts in other currencies have been converted to US dollars at prevailing annual average exchange rates for each year (source: United States Department of Agriculture Economics Research Service);
- The analysis focuses on changes in farm income in each year arising from impact of GM technology on yields, key costs of production notably seed cost and crop protection expenditure but also impact on costs such as fuel and labor. Inclusion of these costs is, however, more limited than the impacts on seed and crop protection costs because only a few of the papers reviewed have included consideration of such costs in their analysis. Therefore in most cases the analysis relates to impact of crop protection

and seed cost only, crop quality (e.g., improvements in quality arising from less pest damage or lower levels of weed impurities which result in price premia being obtained from buyers) and the scope for facilitating the planting of a second crop in a season (e.g., second crop soybeans in Argentina following wheat that would, in the absence of the GM HT seed, probably not have been planted). Thus, the farm income effect measured is essentially a gross margin impact (impact on gross revenue less variable costs of production) rather than a full net cost of production assessment. Through the inclusion of yield impacts and the application of actual (average) farm prices for each year, the analysis also indirectly takes into account the possible impact of GM crop adoption on global crop supply and world prices.

The paper also includes estimates of the production impacts of GM technology at the crop level. These have been aggregated to provide the reader with a global perspective of the broader production impact of the technology. These impacts derive from the yield impacts and the facilitation of additional cropping within a season (notably in relation to soybeans in South America). Details of how these values were calculated (for 2011) are shown in **Supplemental Materials, Appendix 1**.

Table 7. Additional crop production arising from positive yield effects of GM crops

	1996–2011 additional production (million tonnes)	2011 additional production (million tonnes)
Soybeans	110.2	12.74
Corn	195.0	34.54
Cotton	15.85	2.48
Canola	6.55	0.44
Sugar beet	0.45	0.13

Note: sugar beet, US and Canada only and from 2008.

Conclusion

During the past 16 years, the adoption of crop biotechnology (by 15.4 million farmers in 2011) has delivered important economic benefits. The GM IR traits have mostly delivered higher incomes through improved yields in all countries. Many farmers, especially in developed countries, have also benefited from lower costs of production (less expenditure on insecticides). The gains from GM HT traits have come from a combination of effects. The GM HT technology-driven farm income gains have mostly arisen from reduced costs of production, though in South America, it facilitated the move away from conventional to low or no-tillage production systems and enabled many farmers to plant a second crop of soybeans after wheat in the same season.

Over reliance on the use of glyphosate and the lack of crop rotation by some farmers, in some regions, has contributed to the development of weed resistance. As a result, farmers are increasingly adopting a mix of reactive and proactive weed management strategies incorporating a mix of herbicides. This has added cost to the GM HT production systems compared with several years ago, although relative to the conventional alternative, the GM HT technology continues to offer important economic benefits in 2011.

Overall, there is a considerable body of evidence, in peer reviewed literature and summarized in this paper, that quantifies

the positive economic impacts of crop biotechnology. The analysis in this paper therefore provides insights into the reasons why so many farmers around the world have adopted and continue to use the technology. Readers are encouraged to read the peer reviewed papers cited, as well as the many others who have published on this subject (and listed in the references below), and to draw their own conclusions.

Disclosure of Potential Conflicts of Interest

No potential conflict of interest was disclosed.

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Supplemental Materials

Supplemental materials may be found here: www.landesbioscience.com/journals/gmcrops/article/24176

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Key environmental impacts of global genetically modified (GM) crop use 1996–2011

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Keywords: GMO, pesticide, no tillage, carbon sequestration, biotechnology

Given the increasing awareness and appreciation of issues such as global warming and the impact of mankind's activities such as agriculture on the global environment, this paper updates previous assessments of the environmental impact of an important and relatively new technology, crop biotechnology has had on global agriculture. It focuses on the environmental impacts associated with changes in pesticide use and greenhouse gas emissions arising from the use of GM crops. The adoption of the technology has reduced pesticide spraying by 474 million kg (–8.9%) and, as a result, decreased the environmental impact associated with herbicide and insecticide use on these crops [as measured by the indicator the Environmental Impact Quotient (EIQ)] by 18.1%. The technology has also facilitated a significant reduction in the release of greenhouse gas emissions from this cropping area, which, in 2011, was equivalent to removing 10.22 million cars from the roads.

Introduction

GM crop traits have largely been adopted in four main crops, canola, maize, cotton and soybean, and in 2011, accounted for 44% of the global plantings of these crops. In addition, small areas of GM sugar beet (adopted in the USA and Canada since 2008), papaya (in the USA since 1999 and China since 2008), alfalfa (in the US initially in 2005–2007 but latterly since 2011) and squash (in the USA since 2004) have also been planted.

The main traits so far commercialized convey the following:

- Tolerance to specific herbicides (notably to glyphosate and to glufosinate) in maize, cotton, canola (spring oilseed rape), soybean, sugar beet and alfalfa. This GM herbicide tolerant (GM HT) technology allows for the “over the top” spraying of GM HT crops with these specific broad-spectrum herbicides, that target both grass and broad-leaved weeds but do not harm the crop itself;
- Resistance to specific insect pests of maize and cotton. This GM insect resistance (GM IR) or “Bt” technology offers farmers resistance in the plants to major pests such as stem and stalk borers, earworms, cutworms and rootworm (e.g., *Ostrinia nubilalis*, *Ostrinia furnacalis*, *Spodoptera frugiperda*, *Diatraea* spp, *Helicoverpa zea* and *Diabrotica* spp) in maize and bollworm/budworm (*Heliothis* sp and *Helicoverpa*) in cotton.

This paper presents an assessment of some of the key environmental impacts associated with the global adoption of these GM traits. The environmental impact analysis focuses on the following:

- Changes in the amount of insecticides and herbicides applied to the GM crops relative to conventionally grown alternatives and

- The contribution of GM crops toward reducing global greenhouse gas (GHG) emissions

It is widely accepted that increases in atmospheric levels of greenhouse gases such as carbon dioxide, methane and nitrous oxide are detrimental to the global environment [see for example, Intergovernmental Panel on Climate Change (2006¹)]. Therefore, if the adoption of crop biotechnology contributes to a reduction in the level of greenhouse gas emissions from agriculture, this represents a positive development for the world.

The study integrates data for 2011 into the context of earlier developments and updates the findings of earlier analysis presented by the authors in *AgBioForum* 8 (2&3) 187–196,² 9 (3) 1–13,³ 11 (1), 21–38⁴ and 13 (1), 76–94⁵ and *GM Crops* (2011), vol 12, issue 1, 34–49 and (2012) 3: 2 April–June 2012, p 1–9.^{6,7}

The methodology and analytical procedures in this present discussion are unchanged to allow a direct comparison of the new with earlier data (readers should, however, note that some data presented in this paper are not directly comparable with data presented in previous analysis because the current paper takes into account the availability of new data and analysis, including revisions to data for earlier years), and in order to save readers the chore of consulting these earlier papers for details of the methodology and arguments, the journal's editors have agreed that these elements may again be included in full in this updated paper.

The aim of this has been to provide an up to date and as accurate as possible assessment of some of the key environmental impacts associated with the global adoption of GM crops. It is also hoped the analysis makes a contribution to greater understanding of the impact of this technology and facilitates more

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Table 1. GM HT soybean: summary of active ingredient usage and associated EIQ changes 1996–2011

Country	Change in active ingredient use (million kg)	Percent change in amount of active ingredient used	Percent change in EIQ indicator
Romania (to 2006 only)	-0.1	-2.1	-10.5
Argentina	-11.8	-1.7	-11.1
Brazil	+28.5	+4.0	-2.5
USA	-30.1	-4.2	-26.3
Canada	-2.2	-8.5	-21.5
Paraguay	+1.9	+7.5	-8.2
Uruguay	+0.3	+2.5	-9.8
South Africa	+0.3	+7.1	-10.4
Mexico	-0.01	-1.3	-6.0
Bolivia	+0.6	+9.8	-4.9
Aggregate impact: all countries	-12.61	-0.6	-15.5

Notes: negative sign, reduction in usage or EIQ; positive sign, increase in usage or EIQ value.

informed decision making, especially in countries where crop biotechnology is currently not permitted.

Results and Discussion

Environmental impacts of insecticide and herbicide use changes.

HT crops. The primary impact of GM HT (largely tolerant to glyphosate) technology has been a change in the profile of herbicides used. In general, a fairly broad range of, mostly selective (grass weed and broad-leaved weed) herbicides has been replaced by one or two broad-spectrum herbicides (mostly glyphosate) used in conjunction with one or two other (complementary) herbicides (e.g., 2,4-D). This has resulted in the following:

- Aggregate reductions in both the volume of herbicides used (in terms of weight of active ingredient applied) and the associated field EIQ values, indicating net improvements to the environment (for an explanation of the EIQ indicator, see the methodology section);

- In some countries, the average amount of herbicide active ingredient applied to GM HT crops represents a net increase relative to usage on the conventional crop alternative. However, in terms of the associated environmental impact, as measured by the EIQ indicator, the environmental profile of the GM HT crop has commonly been better than its conventional equivalent;

- Where GM HT crops (tolerant to glyphosate) have been widely grown, some incidence of weed resistance to glyphosate has occurred and has become an increasing problem in some regions (see www.weedscience.org). This can be attributed to how glyphosate was used; because of its broad-spectrum post-emergence activity, it was often used as the sole method of weed control. This approach to weed control put tremendous selection pressure on weeds and as a result contributed to the evolution of weed populations predominated by resistant individual weeds. In addition, the facilitating role of GM HT technology in the adoption of RT/NT production techniques in North and South America has also probably contributed to the emergence of weeds resistant to herbicides like glyphosate and to weed shifts toward

those weed species that are not inherently well controlled by glyphosate. As a result, growers of GM HT crops are increasingly being advised to include other herbicides (with different and complementary modes of action) in combination with glyphosate and in some cases to revert to ploughing in their integrated weed management systems. At the macro level, these changes have already begun to influence the mix, total amount, cost and overall profile of herbicides applied to GM HT crops. Compared with five years ago, the amount of herbicide active ingredient applied and number of herbicides used with GM HT crops in many regions has increased, and the associated environmental profile, as measured by the EIQ indicator, deteriorated. However, relative to the conventional alternative, the environmental profile of GM HT crop use has continued to offer important advantages and in most cases, provides an improved environmental profile compared with the conventional alternative (as measured by the EIQ indicator). It should also be noted that many of the herbicides used in conventional production systems had significant resistance issues themselves in the mid-1990s. This was, for example, one of the reasons why glyphosate tolerant soybean technology was rapidly adopted, as glyphosate provided good control of these weeds.

These points are further illustrated in the analysis below.

GM HT soybean. The environmental impact of herbicide use change associated with GM HT soybean adoption is summarized in Table 1. Overall, there has been a small net decrease in the amount of herbicide active ingredient used (-0.6%), which equates to about 12.6 million kg less active ingredient applied to these crops than would otherwise have occurred if a conventional crop has been planted. The environmental impact, as measured by the EIQ indicator, nevertheless, improved by a more significant 15.5% due to the increased usage of more environmentally benign herbicides.

At the country level, most user countries recorded both a net reduction in the use of herbicide active ingredient and an improvement in the associated environmental impact, as measured by the EIQ indicator. The exceptions to this have been

Table 2. GM HT maize: summary of active ingredient usage and associated EIQ changes 1996–2011

Country	Change in active ingredient use (million kg)	Percent change in amount of active ingredient used	Percent change in EIQ indicator
USA	-180.2	-10.9	-13.3
Canada	-5.6	-12.6	-14.6
Argentina	-1.1	-1.4	-4.4
South Africa	-3.3	-5.3	-7.7
Brazil	-2.8	-3.6	-15.1
Aggregate impact: all countries	-193.0	-10.1	-12.5

(1) Negative sign, reduction in usage or EIQ; positive sign, increase in usage or EIQ value. (2) Other countries using GM HT maize—Colombia and the Philippines, not included due to lack of data. Also, hand weeding is likely to be an important form of weed control suggesting any reduction in herbicide use with GM HT maize has been limited.

Table 3. GM HT cotton summary of active ingredient usage and associated EIQ changes 1996–2011

Country	Change in active ingredient use (million kg)	Percent change in amount of active ingredient used	Percent change in EIQ indicator
USA	-11.0	-4.9	-7.6
South Africa	-0.01	= 1.2	-7.1
Australia	-0.7	-3.8	-4.1
Argentina	-3.8	-30.2	-37.1
Aggregate impact: all countries	-15.5	-6.1	-8.9

(1) Negative sign, reduction in usage or EIQ; positive sign, increase in usage or EIQ value. (2) Other countries using GM HT cotton—Brazil, Colombia and Mexico, not included due to lack of data.

Brazil, Bolivia, Paraguay, South Africa and Uruguay, where there have been net increases in the amount of herbicide active ingredient applied, though the overall environmental impact, as measured by the EIQ indicator has been positive. The largest environmental gains have tended to be in developed countries where the usage of herbicides has traditionally been highest and where there has been a significant movement away from the use of several selective herbicides to one broad spectrum herbicide plus one or two additional, complementary herbicides targeted at weeds that are difficult to control with glyphosate.

In 2011, the amount of herbicide active ingredient applied to the global GM HT soybean crop increased by 12.5 million kg (+7.5%) relative to the amount reasonably expected if this crop area had been planted to conventional cultivars. This highlights the point above relating to recent increases in herbicide use with GM HT crops to take account of weed resistance issues. However, despite these increases in the volume of active ingredient used, in EIQ terms, the environmental impact of the 2011 GM HT soybean crop continued to represent an improvement relative to the conventional alternative (a 5.5% improvement).

GM HT maize. The adoption of GM HT maize has resulted in a significant reduction in both the volume of herbicide active ingredient usage and the associated environmental impact, as measured by the EIQ indicator (Table 2).

In 2011, the reduction in herbicide usage was just over 23 million kg of active ingredient (-12.7%), with a larger reduction in the EIQ indicator of 23%. As with GM HT soybeans, the

greatest environmental gains have been in developed countries (e.g., the US and Canada), where the usage of herbicides has traditionally been highest.

GM HT cotton. The use of GM HT cotton delivered a net reduction in herbicide active ingredient use of about 15.5 million kg over the 1996–2011 period. This represents a 6.1% reduction in usage, although in terms of the EIQ indicator, the change has been a higher 8.9% reduction (i.e., there has been a net environmental improvement) (Table 3). In 2011, the use of GM HT cotton technology resulted in a 3.4 million kg reduction in herbicide active ingredient use (-15.9%) and an 18.2% reduction in the field EIQ indicator value.

Other HT crops. GM HT canola (tolerant to glyphosate or glufosinate) has been grown in Canada, the US and more recently Australia, while GM HT sugar beet is grown in the US and Canada. The environmental impacts associated with changes in herbicide usage on these crops are summarized in Table 4. GM HT canola use has resulted in significant reductions in both the amount of herbicide active ingredient used and the associated field EIQ indicator.

In respect of GM HT sugar beet, the change in herbicide usage away from several selective herbicides to a fewer applications of, often a single herbicide (glyphosate) has resulted in an increase in the total volume of herbicides applied to the sugar beet crop but a small net improvement in the associated environmental impact (-4%).

Table 4. Other GM HT crops summary of active ingredient usage and associated EIQ changes 1996–2011

Country	Change in active ingredient use (million kg)	Percent change in amount of active ingredient used	Percent change in EIQ indicator
GM HT canola			
US	-2.5	-36.5	-47.3
Canada	-12.1	-17.2	-27.2
Australia	-0.1	-1.8	-1.1
Aggregate impact: all countries	-14.7	-17.3	-27.1
GM HT sugar beet			
US and Canada	+0.9	+23.9	-4.1

(1) Negative sign, reduction in usage or EIQ; positive sign, increase in usage or EIQ value. (2) In Australia, one of the most popular type of production has been canola tolerant to the triazine group of herbicides (tolerance derived from non GM techniques). It is relative to this form of canola that the main farm income benefits of GM HT (to glyphosate) canola has occurred. (3) InVigor's hybrid vigor canola (tolerant to the herbicide glufosinate) is higher yielding than conventional or other GM HT canola and derives this additional vigor from GM techniques. (4) GM HT alfalfa is also grown in the US. The changes in herbicide use and associated environmental impacts from use of this technology is not included due to a lack of available data on herbicide use in alfalfa.

In 2011, the use of GM HT canola resulted in a 0.43 million kg reduction in the amount of herbicide active ingredient use (-6.4%), with an improvement in the environmental impact, as measured by the EIQ indicator of 18.9%. For GM HT sugar beet, an additional 0.37 million kg of herbicide active ingredient was applied to the sugar beet crops in the US and Canada (+49%). This also resulted in a small net deterioration in the associated environmental impact (-6%: as measured by the EIQ indicator).

Weed resistance. As indicated above, weed resistance to glyphosate has become an issue affecting some farmers using GM HT (tolerant to glyphosate) crops. There are currently 24 weeds recognized as exhibiting resistance to glyphosate worldwide, of which several are not associated with glyphosate tolerant crops (www.weedscience.org). For example, there are currently 13 weeds recognized in the US as exhibiting resistance to glyphosate, of which two are not associated with glyphosate tolerant crops.

A few of the glyphosate-resistant species, such as mare's tail (*Conyza canadensis*) and palmer pigweed (*Amaranthus palmeri*) in the US, are now reasonably widespread, with the affected area being possibly within a range of 10–20% of the total area annually devoted to maize, cotton and soybeans.

This resistance development should, however, be placed in context. All weeds have the ability to develop resistance to all herbicides and there are hundreds of resistant weed species confirmed in the International Survey of Herbicide Resistant Weeds (www.weedscience.org), and reports of herbicide resistant weeds pre-date the use of GM HT crops by decades. Where farmers are faced with the existence of weeds resistant to glyphosate, there is a recognized need to adopt reactive weed management strategies incorporating the use of herbicides with alternative modes of action among other integrated weed management practices (i.e., the same way as control of other non-glyphosate herbicide resistant weeds).

In recent years, there has also been a growing consensus among weed scientists of a need for changes in the weed management programs in GM HT crops, because of the evolution of

these weeds toward populations that are resistant to glyphosate. Growers of GM HT crops are increasingly being advised to be more proactive and include other herbicides (with different and complementary modes of action) in combination with glyphosate in their integrated weed management systems, even where instances of weed resistance to glyphosate have not been found.

This proactive, diversified approach to weed management is therefore the principal strategy for avoiding the emergence of herbicide resistant weeds in GM HT crops. A proactive weed management program also generally requires less herbicide, has a better environmental profile and is more economical than a reactive weed management program.

The adoption of both reactive and proactive weed management programs in GM HT crops has already begun to influence the mix, total amount and overall environmental profile of herbicides applied to GM HT crops. This is shown in the evidence relating to changes in herbicide use, as reported in the annual farm level surveys that the authors have drawn on for this research. For example, in the US GM HT soybean crop in 2011, just over 50% of the crop received an additional herbicide treatment of one of the following active ingredients 2,4-D, chlorimuron, flumioxazin and fomesafen the four most used herbicide active ingredients on the soybean crop after glyphosate (source: derived from GfK Kynetec). This compares with 15% of the GM HT soybean crop receiving a treatment of one of these four herbicide active ingredients in 2006. As a result, the average amount of herbicide active ingredient applied to the US GM HT soybean crop (per hectare) increased by about a third over the previous five year period (the associated EIQ value has increased by a similar amount). This compared with the average amount of herbicide active ingredient applied to the conventional (non GM) soybean alternative which increased by 45% over the same period (the associated EIQ value for the conventional soybean crop increased by 39%). The increase in the use of herbicides on the conventional soybean crop in the US can also be partly attributed to the on-going development of weed resistance to non-glyphosate herbicides commonly used and highlights that

Table 5. GM IR maize: summary of active ingredient usage and associated EIQ changes 1996–2011

Country	Change in active ingredient use (million kg)	Percent change in amount of active ingredient used	Percent change in EIQ indicator
USA	-40.7	-41.9	-36.5
Canada	-0.5	-93.8	-81.5
Spain	-0.4	-34.3	-19.5
South Africa	-1.1	-56.2	-56.2
Brazil	-7.2	-75.6	-75.6
Colombia	-0.1	-33.0	-33.0
Aggregate impact: all countries	-50.0	-45.2	-41.7

(1) Negative sign, reduction in usage or EIQ; positive sign, increase in usage or EIQ value. (2) Other countries using GM IR maize—Argentina, Uruguay, Honduras and the Philippines, not included due to lack of data and/or little or no history of using insecticides to control various pests. (3) % change in active ingredient usage and field EIQ values relates to insecticides typically used to target lepidopteran pests (and rootworm in the US and Canada) only. Some of these active ingredients are, however, sometimes used to control to other pests that the GM IR technology does not target.

Table 6. GM IR cotton: summary of active ingredient usage and associated EIQ changes 1996–2011

Country	Change in active ingredient use (million kg)	Percent change in amount of active ingredient used	Percent change in EIQ indicator
USA	-11.0	-16.7	-16.1
China	-108.7	-30.3	-31.1
Australia	-16.8	-32.4	-32.6
India	-49.8	-19.1	-24.0
Mexico	-1.1	-9.5	-9.4
Argentina	-0.8	-16.2	-22.8
Brazil	-0.5	-8.9	-12.1
Aggregate impact: all countries	-188.7	-24.8	-27.3

(1) Negative sign, reduction in usage or EIQ; positive sign, increase in usage or EIQ value. (2) Other countries using GM IR cotton—Colombia, Burkina Faso, Pakistan and Burma not included due to lack of data. (3) % change in active ingredient usage and field EIQ values relates to all insecticides (as bollworm/budworm pests are the main category of cotton pests worldwide). Some of these active ingredients are, however, sometimes used to control to other pests that that the GM IR technology does not target.

the development of weed resistance to herbicides is a problem faced by all farmers, regardless of production method. In addition, it is interesting to note that in the US cotton crop, while the average amount of herbicide active ingredient used has increased over the last five years, during the last two seasons, average use of glyphosate has fallen, being replaced with additional use of other herbicides. This suggests that US cotton farmers are increasingly adopting current and/or recent recommended practices for managing weed resistance (to glyphosate).

GM IR crops. The main way in which these technologies have impacted on the environment has been through reduced insecticide use (Table 5 and Table 6). While the adoption of GM HT crops resulted in a shift in the profile of herbicides used, the GM IR technology has effectively replaced insecticides used to control important crop pests. This is particularly evident in respect of cotton, which traditionally has been a crop on which intensive treatment regimes of insecticides were common place to control bollworm and budworm pests. In maize, the insecticide use savings have tended to be more limited because the pests that the various technology targets tend to be less widespread in maize

than budworm and bollworm pests are in cotton. In addition, insecticides were widely considered to have limited effectiveness against some pests in maize crops (e.g., stalk borers) because the pests can be found in places where sprays are not effective (e.g., inside stalks). As a result of these factors, the proportion of the maize crop in most GM IR user countries that typically received insecticide treatments before the availability of GM IR technology was much lower than the share of the cotton crops receiving insecticide treatments (e.g., in the US, no more than 10% of the maize crop typically received insecticide treatments targeted at stalk boring pests and about 30–40% of the crop annually received treatments for rootworm).

The global insecticide savings from using GM IR maize and cotton in 2011 were, 6.9 million kg (-86% of insecticides typically targeted at maize stalk boring and rootworm pests) and 17 million kg (-37% of all insecticides used on cotton) respectively of active ingredient use. In EIQ indicator terms, the respective savings in 2011 were 90% for insecticides targeted at maize stalk boring and rootworm pests and 41% for total cotton insecticides. Cumulatively since 1996, the gains have been a 50 million kg

Table 7. Carbon storage/sequestration from reduced fuel use with GM crops 2011

Crop, trait and country	Fuel saving (million liters)	Permanent carbon dioxide savings arising from reduced fuel use (million kg of carbon dioxide)	Permanent fuel savings: as average family car equivalents removed from the road for a year ('000s)
US: GM HT soybean	77	205	91
Argentina: GM HT soybean	262	699	311
Brazil GM HR soybean	136	363	161
Bolivia, Paraguay, Uruguay: GM HT soybean	53	141	63
US: GM HT maize	76	204	91
Canada: GM HT canola	66	177	79
Global GM IR cotton	15	40	18
Brazil IR maize	22	58	26
Total	707	1,887	840

(1) Assumption: an average family car produces 150 g of carbon dioxide per km. A car does an average of 15,000 km/year and therefore produces 2,250 kg of carbon dioxide/year. (2) GM IR cotton. Burkina Faso, India, Pakistan, Burma and China excluded because insecticides assumed to be applied by hand, using back pack sprayers.

reduction in maize insecticide active ingredient use and a 189 million kg reduction in cotton insecticide active ingredient use.

Aggregated (global level) impacts. At the global level, GM technology has contributed to a significant reduction in the environmental impact associated with insecticide and herbicide use on the areas devoted to GM crops. Since 1996, the use of pesticides on the GM crop area was reduced by 474 million kg of active ingredient (an 8.9% reduction), and the environmental impact associated with herbicide and insecticide use on these crops, as measured by the EIQ indicator, fell by 18.3%. In 2011, the environmental benefit was equal to a reduction of 38 million kg of pesticide active ingredient use (-8.8%), with the environmental impact associated with insecticide and herbicide use on these crops, as measured by the EIQ indicator, falling by 23%.

At the country level, US farms have seen the largest environmental benefits, with a 274 million kg reduction in pesticide active ingredient use (58% of the total). This is not surprising given that US farmers were first to make widespread use of GM crop technology, and for several years, the GM adoption levels in all four US crops have been in excess of 80%, and insecticide and/or herbicide use has in the past been the primary method of weed and pest control. Important environmental benefits have also occurred in China and India from the adoption of GM IR cotton, with a reduction in insecticide active ingredient use of over 158 million kg (1996–2011).

Results: greenhouse gas emission savings. Reduced fuel use. The fuel savings associated with making fewer spray runs in GM IR crops of maize and cotton (relative to conventional crops) and the switch to reduced tillage or no tillage (RT/NT) farming systems facilitated by GM HT crops, have resulted in permanent savings in carbon dioxide emissions. In 2011, this amounted to a saving of about 1,887 million kg of carbon dioxide, arising from reduced fuel use of 707 million liters (Table 7). These savings are equivalent to taking 0.84 million cars off the road for one year.

The largest fuel use related reductions in carbon dioxide emissions have come from the adoption of GM HT technology in soybeans and how it has facilitated a switch to RT/NT

production systems with their reduced soil cultivation practices (about 75% of total savings). These savings have been greatest in South America.

Over the period 1996 to 2011, the cumulative permanent reduction in fuel use has been about 14,609 million kg of carbon dioxide, arising from reduced fuel use of 5,471 million liters. In terms of car equivalents, this is equal to taking nearly 6.5 million cars off the road for a year.

Additional soil carbon storage/sequestration. As indicated earlier, the widespread adoption and maintenance of RT/NT production systems in North and South America, facilitated by GM HT crops (especially in soybeans) has improved growers ability to control competing weeds, reducing the need to rely on soil cultivation and seed-bed preparation as means to getting good levels of weed control. As a result, as well as tractor fuel use for tillage being reduced, soil quality has been enhanced and levels of soil erosion cut. In turn, more carbon remains in the soil and this leads to lower GHG emissions.

Based on savings arising from the rapid adoption of RT/NT farming systems in North and South America, an extra 5,751 million kg of soil carbon is estimated to have been sequestered in 2011 (equivalent to 21,108 million tonnes of carbon dioxide that has not been released into the global atmosphere). These savings are equivalent to taking 9.4 million cars off the road for one year (Table 8).

The additional amount of soil carbon sequestered since 1996 has been equivalent to 170,961 million tonnes of carbon dioxide that has not been released into the global atmosphere. Readers should note that these estimates are based on fairly conservative assumptions and therefore the true values could be higher. Also, some of the additional soil carbon sequestration gains from RT/NT systems may be lost if subsequent ploughing of the land occurs.

Estimating the possible losses that may arise from subsequent ploughing would be complex and difficult to undertake. This factor should be taken into account when using the estimates presented in this paper. It should also be noted that this soil

Table 8. Context of carbon sequestration impact 2011: car equivalents

Crop, trait and country	Additional carbon stored in soil (million kg of carbon)	Potential additional soil carbon sequestration savings (million kg of carbon dioxide)	Soil carbon sequestration savings: as average family car equivalents removed from the road for a year ('000s)
US: GM HT soybean	1,128	4,141	1,840
Argentina: GM HT soybean	1,929	7,081	3,147
Brazil GM HR soybean	1,002	3,676	1,634
Bolivia, Paraguay, Uruguay: GM HT soybean	388	1,425	633
US: GM HT maize	1,061	3,894	1,731
Canada: GM HT canola	243	891	396
Global GM IR cotton	0	0	0
Brazil IR maize	0	0	0
Total	5,751	21,108	9,381

carbon saving is based on savings arising from the rapid adoption of RT/NT farming systems, for which the availability of GM HT technology, has been cited by many farmers as an important facilitator. GM HT technology has therefore probably been an important contributor to this increase in soil carbon sequestration, but is not the only factor of influence. Other influences such as the availability of relatively cheap generic glyphosate (the real price of glyphosate fell 3-fold between 1995 and 2000 once patent protection for the product expired) have also been important.

Cumulatively, the amount of carbon sequestered may be higher than these estimates due to year-on-year benefits to soil quality (e.g., less soil erosion, greater water retention and reduced levels of nutrient run off). However, it is equally likely that the total cumulative soil sequestration gains have been lower because only a proportion of the crop area will have remained in NT/RT. It is, nevertheless, not possible to confidently estimate cumulative soil sequestration gains that take into account reversion to conventional tillage because of a lack of data. Consequently, the estimate provided of 170,961 million tonnes of carbon dioxide not released into the atmosphere should be treated with caution.

Aggregating the carbon sequestration benefits from reduced fuel use and additional soil carbon storage, the total carbon dioxide savings are equal to about 22,995 million kg, equivalent to taking 10.22 million cars off the road for a year. This is roughly equal to 36% of registered cars in the UK.

Methodology

The available literature examining the environmental impact of pesticide use change and implications for greenhouse gas emissions associated with the adoption of GM crops is more limited than the literature examining the economic impacts associated with use of the technology. Therefore while this analysis draws on the available literature, it is largely based on the authors own analysis of farm level changes in husbandry practices and pesticide usage data. In particular, readers should note that the analysis of the environmental impact of pesticide usage changes with GM crops includes consideration of measures taken by some

farmers to address issues of weed resistance to the main herbicide (glyphosate) used with GM HT crops.

Methodology: environmental impacts from insecticide and herbicide use changes. Assessment of the impact of GM crops on insecticide and herbicide use requires comparisons of the respective weed and pest control measures used on GM vs. the “conventional alternative” form of production. This presents a number of challenges relating to availability and representativeness.

Comparison data ideally derives from farm level surveys which collect usage data on the different forms of production. A search of the literature on insecticide or herbicide use change with GM crops shows that the number of studies exploring these issues is limited,^{8,9,10} with even fewer^{11,12} providing data to the pesticide (active ingredient) level. Second, national level pesticide usage survey data are also extremely limited; in fact there are no published, detailed, annual pesticide usage surveys conducted by national authorities in any of the countries currently growing GM crop traits and, the only country in which pesticide usage data are collected (by private market research companies) on an annual basis and which allows a comparison between GM and conventional crops to be made, is the US. The US Department of Agriculture also conducts pesticide usage surveys but these are not conducted on an annual basis (e.g., the last time maize was included was 2010 and previous to this in 2005) and do not disaggregate usage by production type (GM vs. conventional).

Even where national pesticide use survey data are available, it may be of limited value. A reasonable estimate of the amount of herbicide or insecticide usage changes that have occurred with GM crop technology, requires an assessment of what herbicides/insecticides might reasonably be expected to be used in the absence of crop biotechnology on the relevant crops (i.e., if the entire crops used non GM production methods). Applying usage rates for the current (remaining) conventional crops is one approach, however, this invariably provides significant under estimates of what usage might reasonably be in the absence of crop biotechnology, because the conventional cropping data set used to identify pesticide use relates to a relatively small share of total crop area. This has been the case, for example, in respect of the US maize, canola, cotton and soybean crops for many years.

Thus in 2011, the conventional share (not using GM HT technology) of each crop was only 6%, 28%, 27% and 2% respectively for soybean, maize, cotton and canola, with the conventional share having been below 50% of the total since 1999 in respect of the soybean crop, since 2001 for the cotton and canola crops and since 2007 for the maize crop (source: USDA—note the conventional share refers to not using GM HT technology, with some of the “conventional crops” using crop biotechnology-traited seed providing GM insect resistance only. Also, the private market research data set suggests that the proportion of the US maize and cotton crops not using GM HT technology in 2011 is smaller at 10% in both the maize and cotton crops).

The reasons why this conventional cropping data set is unrepresentative of the levels of herbicide/insecticide use that might reasonably be expected in the absence of biotechnology include the following:

- While the degree of pest and/or weed problems and/or damage vary by year, region and within region, farmers’ who continue to farm conventionally may be those with relatively low levels of pest and/or weed problems and hence see little, if any economic benefit from using the GM traits targeted at minimal pest and/or weed problems. In addition, late or non-adopters of new technology in agriculture are typically those who generally make less use of newer technologies than earlier adopters. As a result, insecticide and herbicide usage levels for these non-adopting farmers tends to be below the levels that would reasonably be expected on an average farm with more typical pest and weed infestations and where farmers are more willing to adopt new technology;

- Some of the farms continuing to use conventional seed generally use extensive, low intensity production methods (including organic) which feature, limited (below average) use of herbicides and insecticides. The usage patterns of this sub-set of growers is therefore likely to understate usage for the majority of farmers if they all returned to farming without the use of GM technology;

- The widespread adoption of GM IR technology has resulted in “area-wide” suppression of target pests in maize crops. As a result, conventional farmers (e.g., of maize in the US) have benefited from this lower level of pest infestation and the associated reduced need to conduct insecticide treatments;¹³

- Some of the farmers using GM traits have experienced improvements in pest and/or weed control from using this technology relative to the conventional control methods previously used. If these farmers were to now switch back to using conventional techniques, it is likely that most would wish to maintain the levels of pest and/or weed control delivered with use of the GM traits and therefore some would use higher levels of insecticide and herbicide than they did in the pre GM crop days. This argument can, however, be countered by the constraining influence on farm level pesticide usage that comes from the cost of pesticides and their application. Ultimately the decision to use more pesticide or not would be made at the farm level according to individual assessment of the potential benefits (from higher yields) compared with the cost of additional pesticide use.

This problem of poor representativeness of the small conventional data set has been addressed by first, using the average recorded values for insecticide and herbicide usage on

conventional crops for years only when the conventional crop accounted for the majority of the total crop and, second, in other years (e.g., from 1999 for soybeans, from 2001 for cotton and from 2007 for maize in the US) applying estimates of the likely usage if the whole US crop was no longer using crop biotechnology, based on opinion from extension and industry advisors across the US as to what farmers might reasonably be expected to use in terms of weed control practices and usage levels of insecticide and herbicide. In addition, the usage levels identified from this methodology were cross checked (and subject to adjustment) against historic average usage levels of key herbicide and insecticide active ingredients from the private market research data set so as to minimize the scope for overstating likely usage levels on the conventional alternative. Overall, this approach has been applied in other countries where pesticide usage data are available, though more commonly, because of the paucity of available data, the analysis relies more on extension/advisor opinion and knowledge of actual and potential pesticide use.

This methodology has been used by others.¹⁴⁻¹⁶ It also has the advantage of providing comparisons of current crop protection practices on both GM crops and the conventional alternatives and so takes into account dynamic changes in crop protection management practices and technologies rather than making comparisons solely on past practices. Details of how this methodology has been applied to the 2011 calculations, sources used for each trait and country combination examined and examples of typical conventional vs. GM pesticide applications are provided in **Supplemental Appendices 1 and 2**.

The most common way in which environmental impact associated with pesticide use changes with GM crops has typically been presented in the literature has been in terms of the volume (quantity) of pesticide applied. However, while the amount of pesticide applied to a crop is one way of trying to measure the environmental impact of pesticide use, this is not a good measure of environmental impact because the toxicity of each pesticide is not directly related to the amount (weight) applied. For example, the environmental impact of applying a kilogram of dioxin to a crop is far more toxic than applying a kilogram of salt. There exist alternative (and better) measures that have been used by a number of authors of peer reviewed papers to assess the environmental impact of pesticide use change with GM crops rather than simply looking at changes in the volume of active ingredient applied to crops. In particular, there are a number of peer reviewed papers that utilize the Environmental Impact Quotient (EIQ) developed at Cornell University by Kovach et al.¹⁷ and updated annually. This effectively integrates the various environmental impacts of individual pesticides into a single “field value per hectare”. The EIQ value is multiplied by the amount of pesticide active ingredient (ai) used per hectare to produce a field EIQ value. For example, the EIQ rating for glyphosate is 15.33. By using this rating multiplied by the amount of glyphosate used per hectare (e.g., a hypothetical example of 1.1 kg applied per ha), the field EIQ value for glyphosate would be equivalent to 16.86/ha. The EIQ indicator used is therefore a comparison of the field EIQ per ha for conventional vs. GM crop production systems, with the total environmental impact or load

of each system, a direct function of respective field EIQ/ha values and the area planted to each type of production (GM vs. conventional). The use of environmental indicators is commonly used by researchers and the EIQ indicator has been, for example, cited by Brimmer et al.¹⁸ in a study comparing the environmental impacts of GM and conventional canola and by Kleiter et al.¹⁹ The EIQ indicator provides an improved assessment of the impact of GM crops on the environment when compared with only examining changes in volume of active ingredient applied, because it draws on some of the key toxicity and environmental exposure data related to individual products, as applicable to impacts on farm workers, consumers and ecology.

In this paper, the EIQ indicator is used in conjunction with examining changes in the volume of pesticide active ingredient applied. Readers should, however, note that the EIQ is an indicator of environmental toxicity only and does not take into account all environmental issues and impacts (e.g., impacts on soil erosion). It is therefore not a comprehensive indicator.

Detailed examples of the relevant amounts of active ingredient used and their associated field EIQ values for GM vs. conventional crops for the year 2011 are presented in **Supplemental Appendix 2**.

Methodology: impact of greenhouse gas emissions. The methodology used to assess impact on greenhouse gas emissions combines reviews of literature relating to changes in fuel and tillage systems and carbon emissions, coupled with evidence from the development of relevant GM crops and their impact on both fuel use and tillage systems. Reductions in the level of GHG emissions associated with the adoption of GM crops are acknowledged in a wide body of literature.²⁰⁻²⁸

First, GM crops contribute to a reduction in fuel use due to less frequent herbicide or insecticide applications and a reduction in the energy use in soil cultivation. For both herbicide and insecticide spray applications, the quantity of energy required to apply the pesticides depends upon the application method. For example, in the USA, a typical method of application is with a 50 foot boom sprayer which consumes approximately 0.84 L/ha (Lazarus 2012)²⁹—in previous analysis 1.31 L/ha has been used, with the current figure by Lazarus being an update). In terms of GHG, each liter of tractor diesel consumed contributes an estimated 2.67 kg of carbon dioxide into the atmosphere (this also updates a previously used co-efficient of 2.75 to convert 1 L of diesel to kg of carbon dioxide). Given that many farmers apply insecticides via sprayers pulled by tractors, which tend to use higher levels of fuel than self-propelled boom sprayers, these estimates for reductions in carbon emissions, which are based on self-propelled boom application, probably understate the carbon benefits.

In addition, there has been a shift from conventional tillage (CT) to reduced/no till (RT/NT). No-till farming means that the ground is not ploughed at all, while reduced tillage means that the ground is disturbed less than it would be with traditional tillage systems. For example, under a no-till farming system, soybean seeds are planted through the organic material that is left over from a previous crop such as corn, cotton or wheat facilitated by GM HT technology (see for example,

CTIC²⁰ and American Soybean Association²¹ especially where soybean growing and/or a soybean: corn rotations are commonplace). Before the introduction of GM HT technology, RT/NT systems were practiced by some farmers with varying degrees of success using a number of herbicides, though in many cases, a reversion to CT was common after a few years due to poor levels of weed control. The availability of GM HT technology provided growers with an opportunity to control weeds in a RT/NT system with a non-residual, broad-spectrum, foliar herbicide as a “burndown” pre-seeding treatment followed by a post-emergent treatment when the crop became established, in what proved to be a more reliable and commercially attractive system than was previously possible. These technical and cost advantages have contributed to the rapid adoption of GM HT cultivars and RT/NT production systems. For example, there has been a 50% increase in the RT/NT soybean area in the US and a 7-fold increase in Argentina since 1996. In 2011, RT/NT production accounted for 80% and 87% respectively of total soybean production in the US and Argentina, with over 95% of the RT/NT soybean crop area in both countries using GM HT technology.

Substantial growth in RT/NT production systems have also occurred in Canada, where the proportion of the total canola crop accounted for by RT/NT systems increased from 25% in 1996 to 50% by 2004 and in 2011, accounted for 75% of the total crop (95% the RT/NT canola area is planted with GM HT cultivars).

This shift away from a plough-based, to a RT/NT production system has resulted in a reduction in fuel use. The fuel savings used in this paper are drawn from a review of literature including Jasa,²³ CTIC,²⁰ University of Illinois,³⁰ USDA Energy Estimator³¹ and Reeder.³² In the analysis presented below, it is assumed that the adoption of NT farming systems in soybean production reduces cultivation and seedbed preparation fuel usage by 27.12 L/ha compared with traditional conventional tillage and in the case of RT (mulch till) cultivation by 10.39 L/ha. In the case of maize, NT results in a saving of 24.41 L/ha and 7.52 L/ha in the case of RT compared with conventional intensive tillage. These are conservative estimates and are in line with the USDA Energy Estimator for soybeans and maize. Readers should note that in previous papers examining this impact, the authors have used different savings that reflect changing estimates of fuel use by the USDA Energy Estimator. For example in the paper covering the period 1996–2010 savings of 27.22 L/ha for NT and 9.56 L/ha for RT compared with CT were used.

The adoption of NT and RT systems in respect of fuel use therefore results in reductions of carbon dioxide emissions of 72.41 kg/ha and 27.74 kg/ha respectively for soybeans and 65.17 kg/ha and 20.08 kg/ha for maize.

Second, the use of RT/NT farming systems increases the amount of organic carbon in the form of crop residue that is stored or sequestered in the soil and therefore reduces carbon dioxide emissions to the environment. A number of researchers have examined the relationship between carbon sequestration and different tillage systems.^{1,25-27,33-40} This literature shows that the amount of carbon sequestered varies by soil type, cropping

system, eco-region and tillage depth. It also shows that tillage systems can impact on levels of other GHG emissions such as methane and nitrous oxide and on crop yield.

Overall, the literature highlights the difficulty in estimating the contribution NT/RT systems can make to soil carbon sequestration, especially because of the dynamic nature of soils, climate, cropping types and patterns. If a specific crop area is in continuous NT crop rotation, the full soil carbon sequestration benefits described in the literature can be realized. However, if the NT crop area is returned to a conventional tillage system, a proportion of the soil organic carbon gain will be lost. The temporary nature of this form of carbon storage only becomes permanent when farmers adopt a continuous NT system, which as indicated earlier, is highly dependent upon having an effective herbicide-based weed control systems.⁴¹⁻⁵²

Drawing on the available literature, the analysis presented in this paper uses the following conservative assumptions:

- North America: soil carbon sequestered by tillage system for corn and soybean in continuous rotation; NT systems store 375 kg of carbon/ha/year, RT systems store 175 kg carbon/ha/year; and CT systems release 25 kg carbon/ha/y;
- South America: soil carbon retained is 175 kg of carbon/ha/yr for NT/RT (soybean) cropping systems but CT systems release 25 kg carbon/ha/y (As South American countries do not disaggregate data between no and reduced tillage areas, the more conservative carbon saving associated with reduced tillage is used);
- One kilogram of carbon sequestered is equivalent to 3.67 kg of carbon dioxide.

In previous analysis, the authors have assumed NT systems store 300 kg of carbon/ha/yr, RT systems store 100 kg of carbon/ha/y and CT systems release 100 kg of carbon/ha/y. The changes adopted in this paper reflect recent research referred to above. Readers should also note that the relative difference has remained unchanged at +400 kg and +200 kg of carbon/ha/yr respectively. Similarly, for Argentina, the authors applied a carbon sequestration rate of 100 kg of carbon/ha/y for RT/NT systems and a carbon release of 100 kg of carbon/ha/y for CT systems, the difference between the systems has remained at 200 kg of carbon/ha/y in both the old and current analysis.

Overall, the GHG emission savings derived from reductions in fuel use for crop spraying have been applied only to the area of GM IR crops worldwide (but excluding countries where conventional spraying has traditionally been by hand, such as in India and China) and the savings associated with reductions in fuel

from less soil cultivation plus soil carbon storage have been limited to NT/RT areas in North and South America that have utilized GM HT technology. Lastly, some RT/NT areas have also been excluded where the consensus view is that GM HT technology has not been the primary reason for use of these non-plough-based systems (i.e., parts of Brazil).

Additional detail relating to the estimates for carbon dioxide savings at the country and trait levels are presented in **Supplemental Appendix 3**.

Conclusions

During the past 16 y, the adoption of crop biotechnology by many farmers (15.4 million in 2011) has delivered important positive environmental contributions through its facilitation and evolution of environmentally friendly farming practices. More specifically,

- The environmental gains from the GM IR traits have mostly derived from decreased use of insecticides;
- The gains from GM HT traits have come from a combination of effects. In terms of the environmental impact associated with herbicide use, important changes in the profile of herbicides used have occurred, in favor of more environmentally benign products. Second, the technology has facilitated changes in farming systems, by enabling farmers to capitalize on the availability of a low cost, broad-spectrum herbicide (glyphosate) and move away from conventional to RT/NT production systems in both North and South America. This change in production system has reduced levels of GHG emissions from reduced tractor fuel use and additional soil carbon sequestration.

In relation to GM HT crops, however, over reliance on the use of glyphosate by some farmers, in some regions, has contributed to the development of weed resistance. As a result, farmers are increasingly adopting a mix of reactive and proactive weed management strategies incorporating a mix of herbicides. Despite this, the overall environmental gains arising from the use of GM crops have been and continue to be substantial.

Disclosure of Potential Conflicts of Interest

No potential conflict of interest was disclosed.

Supplemental Materials

Supplemental materials may be found here:
www.landesbioscience.com/journals/gmcrops/articles/24459

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