

LETTER TO COMMISSIONER BYRNE ON GMO'S, APRIL 9, 2002

David Byrne
Commissioner for Health and Consumer Protection
European Commission
200, Rue de la Loi
Brussels B-1049
Belgium

Cc: Commissioners Pascal Lamy and Margot Wallström

April 9, 2002

Dear Commissioner Byrne,

The use of genetic modification in food production continues to be an important issue for consumers and therefore an issue of great interest to the members of the Transatlantic Consumer Dialogue (TACD).

Given recent initiatives by the European Commission to introduce a system for the traceability and labelling of GMOs, including a requirement to label all GM derivatives, the TACD would once again like to draw your attention to our position paper on this issue and specifically the section that deals with consumers' right to choose. TACD's position paper supports the Commission's approach as a way of ensuring greater consumer information and choice.

Here we would like to draw your attention to sections from the TACD April 2000 position paper on Consumer Concerns About Biotechnology And Genetically Modified Organisms (Food-05pp-00):

Consumers' right to know:

Genetic modification has important implications in the spheres of health, the environment, ethics, religious beliefs and the economy. TACD believes that consumers have a fundamental right to know what they are eating. Therefore, all GM food, including food produced from GM ingredients that do not remain detectable in the final product, should be labelled. Consumer concerns relate to the process of GM and not to the end product.

In order to enjoy their right to know about biotechnology and GM foods, consumers want information that includes the full disclosure of all aspects of the safety evaluation of GM foods, as well as the clear and truthful labelling of any approved products that come on to the market.

Consumer attitudes and values relating to GM must be incorporated into the approval and decision-making processes regarding these foods.

Governments should also consider developing an internationally recognized symbol indicating that the product has been produced using genetic modification. This should not only apply to foodstuffs, but also to feeding-stuffs that have been produced using genetic modification.

Consumers' right to choose:

The choice of whether to eat or not to eat GM foods should remain with consumers, but this right to choose is being undermined by the mixing of GM products (namely soya and maize) with conventional varieties.

Consumers consider that labelling of the final product should depend on the presence of

GMOs in the raw materials from which the product is made. Such accurate and rigorous labelling requires complete traceability of GMOs throughout the entire production, processing and distribution chain.

Therefore, it is fundamental to ensure traceability through the segregation of GM products from traditional products. As long as the manufacturer cannot have full knowledge of the genetic status of the ingredients, the consumers' right to be informed and to choose will not be guaranteed.

It is crucial to preserve a non-GM supply for crops. Consumers find non-segregation unacceptable. When GM crops are cultivated they must be segregated and consumers call on official authorities to play an active role to assist in the establishment of the necessary facilities in this respect.

Rigorous and robust controls must be put in place at all subsequent stages of the food chain to ensure this is maintained. For consumers to have a meaningful choice, an alternative to GM must be available. Identity preserved non-GM supplies should ideally be extended to include animal feed and ultimately genetically modified processing aids.

There is the risk that consumers will infer wrongly that unlabelled foods do not contain products from GM sources. Traceability should be ensured throughout the food chain, based on documentation, so that the original source can be identified. Therefore, sensitive and reliable test methods should be developed and validated to confirm whether or not a product has been genetically modified. A threshold must be agreed by US and EU governments that allows for unintentional contamination of Identity Preserved non-GM supplies. Such a threshold must be kept to an absolute minimum and should be reviewed with the intention of further reduction as experience of control methods develops.

Consumers should not be asked to pay more for non-GM food, since they have not asked for it. Much more than traceability of non-GM ingredients, segregation and traceability of GM crops and ingredients should be the rule.

Traceability is essential for safety reasons as well as for ensuring choice - it is essential that action can be taken should a food safety problem arise in the future.

Recommendation:

TACD requires labelling of all GM food sold in Europe and the US, including ingredients of processed food, and food where GM ingredients have been used in production even if they are no longer detectable in the final product. Labelling of animal feed that contains GM ingredients should also be required.

We hope that you will be able to consider our viewpoint when deciding on appropriate controls in this area. The full position paper (Food-05pp-00) is also attached for your information.

Yours sincerely,

Ben Wallis, TACD Coordinator
On behalf of the TACD Steering Committee

Anna Bartolini, CNCU (Italian National Council of Consumers and Users)
Benedicte Federspiel, Forbrugerraadet (Danish Consumer Council)
Jean Ann Fox, Consumer Federation of America
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