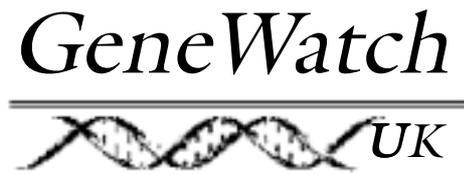


The labelling of GMOs and their derivatives in food and animal feed



European Parliamentary
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June 2002

During their session in Strasbourg from 1st-4th July, the European Parliament will vote on two proposed regulations on labelling and traceability of GM foods and animal feed:

- a) Genetically Modified Food and Feed (COM (2001) 425 - 2001/0173/ (COD))
- b) Traceability and Labelling of GM Food and Animal Feed (COM(2001)182 – 2001/0180(COD))

These two regulations will have fundamental effects on the way GMOs and the products derived from them are regulated and controlled in the European Union. They were drawn up by the Commission in response to the *de-facto* moratorium on the further commercialisation of GM crops that has been in place since 1998.

Possibly the most contentious issue in these regulations is the proposal to extend labelling to all GMO derived products, a move supported by the public. Currently, only products which contain foreign DNA or protein must be labelled when from a GM source. However, the UK Government, under advice from the Food Standards Agency, has said that to label all products derived from GMOs would be excessively expensive and open to fraud. Instead, they have proposed that there should be a legally recognised GM-free label. This briefing looks at both the need and the practicalities of labelling such products.

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The GeneWatch EU Parliamentary Briefing No 1."Proposed Regulations on the Traceability and Labelling of GM Food and Animal Feed" - outlines the other main areas of contention in these regulations. This briefing can be found on the GeneWatch website at www.genewatch.org.

1. What are GMO derived products?

This term covers all products that have been produced by the processing of whole GMOs, whether they contain foreign DNA/protein or not. Common examples of derivatives not covered under current labelling laws are:

- ◆ from soya - lecithin, oil;
- ◆ from maize – oil, glucose syrup, starch and vitamin C.

The Commission's proposed definition does not include "processing aids", such as enzymes which are used in food processing.

2. The consumer desire for labelling of all GM products

A 2001 Eurobarometer survey showed that¹ :

- ◆ 94% of Europeans want the right to choose whether to eat GM food;
- ◆ 85.9% want to know more about GM foods before eating them;
- ◆ 70.9% do not want to eat this type of food at all.

UK based research specifically considering these proposed regulations showed that² :

- ◆ 64% of consumers want labelling of ingredients made from GM plants;
- ◆ 56% still want this labelling if all traces of the GM raw materials were destroyed during the food processing;
- ◆ 79% think that meat and other products from animals fed with GM feed should be labelled.

70% [of Europeans] do not want to eat this type of food at all

These polls show that people want to know what they are eating in regard to GM and that the majority specifically want to know this information even for highly processed foods. So there is strong support for the Commission's proposals.

3. Why are the public sceptical about GM products?

Research also shows that people's concerns are not limited to eating "genetically modified DNA or protein" but encompass a wide range of issues. Some of the key issues raised repeatedly in one pan-European³ study were:

- ◆ Why do we need GMOs? What are the benefits?
- ◆ Who decided GM crops should be developed and how?
- ◆ Do regulatory authorities have sufficient powers and resources to effectively counter-balance large companies who wish to develop these products?
- ◆ Why are we not given effective choice about whether or not to buy and consume these products?
- ◆ What plans exist for remedial action if and when unforeseen harmful impacts occur?
- ◆ Who will be responsible in case of unforeseen harm? How will they be held to account?

With GM-free labelling, the only information... ..on the majority of foods would be that "these products may or may not contain ingredients derived from GMOs"

Current labelling does not allow people to make choices relating to these wider concerns, whereas labelling of derivatives would give people fuller information about the use of GM products. It would also assure people that all GM and GM derived products could be traced and removed from the food chain should the need arise.

4. The argument against a GM-free label.

In practice, a GM-free label will mean that some products or ingredients will be labelled as GM, some will be labelled as GM-free, but the vast majority will not be labelled even though they may contain GM derivatives. The only information the public would have on the majority of foods would be that "*these products may or may not contain ingredients derived from GMOs*".

Such a situation will not enhance consumer confidence in the food chain. Nor will it make them feel that GMOs are being introduced in a controlled fashion or that they have a choice about whether to eat them or not.

Many food companies who trade on particular qualities of their foods would have to pay to prove that their food was GM-free even though it may always have been GM-free and they may have no intention of using GM foods or ingredients.

5. Is labelling products derived from GMOs excessively expensive and open to fraud?

The FSA and UK Government claim that tracing GMO derived products, without any physical means of testing their status, would be excessively expensive and open to fraud leading to a loss of consumer confidence.

However, there is globally a trend towards the development of full traceability in the food chain and the definition of traceability is currently being discussed by CODEX Alimentarius. The new EU Common Food Law⁴ establishes the principle of traceability and defines it as: *“the ability to trace and follow a food, feed.....through all stages of production, processing and distribution”*. Traceability is not only being implemented for food safety reasons but also to enable better consumer information.

The tracing of GM derived products through the food chain would require an Identity Preservation (IP) system. Such systems rely on a paper trail and there are a number already in place - for example, all organic, halal and kosher food labels and the bovine registration and labelling scheme⁵. It is common practice for these systems to rely on third parties to provide assurances and external examination and thus neither the buyer nor the seller are the party actually certifying the product. This system is crucial in preventing fraud.

Many supermarkets and food manufacturers have already removed both GM soya and maize and their derivatives from products as a direct response to concerns raised by their customers. There have been many products for which it has been necessary to implement traceability systems. For example, Carrefour, one of Europe’s largest supermarkets, had to implement traceability systems on 221 products⁶. Furthermore, supermarkets and food manufacturers are now implementing similar systems for products from animals fed on non-GM diets. Notably, the removal of GM and GM-derived products has not led to increased costs to consumers.

The ability to source non-GM products and ingredients has been a result of the whole food industry working together. The British Retail Consortium, which represents all the major food retailers in Britain, said in their response to the FSA’s consultation on these regulations that: *“BRC feels that the new proposals for labelling are catching up with that which is current practice across the retail sector”*. In contrast, the Food and Drink Federation, which includes companies such as ADM and Cargil that have a financial interest in the development of GM crops⁷, say that: *“the complexity of the proposal and traceability and labelling requirements place an excessive burden on the food chain which will be both difficult and costly to deliver, without adding to consumer protection or significantly enhancing consumer information”*.

It is a spurious argument that the Commission’s proposals could not be implemented. This argument has only been put forward by the biotechnology industry and those wishing to make the use of GMOs as easy and free of legislation as possible. Such an approach, however, goes completely against public opinion. It is only by backing the Commission’s proposals to provide full traceability and an extension of labelling that consumer concerns over GM can start to be tackled.

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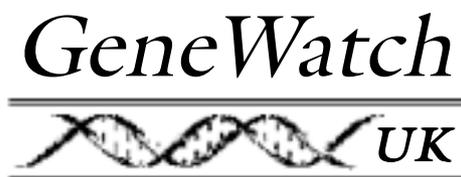
Action points for MEPs during Parliamentary debate on traceability and labelling of GM food and animal feed.

GeneWatch calls upon MEPs to reflect public opinion, to ensure maximum choice and recognise that most UK food manufacturers and retailers already have traceability systems in place. MEPs can do this by supporting the Environment Committee's report and proposed amendments. In particular they should;

- ◆ support the basis of the regulations which extend consumer choice to GM derivatives and establish proper traceability;
- ◆ oppose GM-free labelling;
- ◆ support the lower GM contamination threshold of 0.5% before labelling is required;
- ◆ support the Committee's amendment not to allow any contamination threshold for GMOs that have not received full approval in the EU;
- ◆ support the Committee's amendment to extend labelling to cover products from animals fed on GM feed.

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