



Brussels, 17 March 2005

Time to change European policy on GMOs in agriculture

Dear Commissioner

You are about to decide on EU policy on genetically modified foods and crops (GM or GMOs). This will be an important decision, not just for how GM foods are managed in the European Union, but also in relation to how the Commission is viewed by citizens. At a time when the public has deep concerns about the behaviour of European bureaucracy in relation to democratic processes and financial probity, decisions in the sensitive field of GM foods and crops which do not give weight to the views of the European public will further erode confidence. It is also an economic decision, because growing GMOs will influence the GM-free sector and increase its production costs.

Therefore, we believe that you should not continue the unpopular strategy of the former Commission - which pushed through new products against the will of the public and the member states. This is a perfect opportunity for you to put Europe's environment and the well-being of its citizens before the economic might of biotechnology companies and the US government. It is also a chance to put less burden on the whole GM-free sector which is dominant in Europe and provides hundreds of thousands of jobs.

1. Cultivation

You will have to decide whether to propose approvals for the commercial growing of GM crops, in particular maize. However, most countries have not yet implemented measures to prevent contamination, research into the economic knock-on effects of growing GM crops is incomplete and the long-term effects on the environment are still largely unknown. There is no comprehensive system for monitoring and thresholds for seed contamination are still under discussion. Giving such approval now could lead to irreversible impacts on the environment, farmers and consumers. Under such conditions the commercial growing of GMOs has to be stopped.

2. Contamination

The previous Commission chose to leave the issue of co-existence to member states. Subsequently, some countries introduced strong measures, some weak and the majority no measures at all. The new Agriculture Commissioner has stated that she may now introduce an EU legal framework on coexistence. We believe that the Commission should take forward an approach to co-existence which will allow regions to determine for themselves whether growing GM crops is in the wider interests of their farmers and environment. It should also include strict liability provisions and take into account not only economic but also ecological aspects of growing GM crops.

3. Old GM crops and safeguard clauses

In 2004, the previous Commission approved the EU-wide sale of 17 GM seeds from Monsanto's MON810 maize. This GMO was approved under old European laws that have been superseded by new legislation that requires a stricter risk assessment, a monitoring plan and must provide the public with more information of where the crops are grown. To ensure proper protection of human health and the environment at standards required of any new approvals today, MON 810 should no longer be allowed to be grown. In addition, the initiative of the old Commission to attempt to lift the national safeguard clauses should be withdrawn.

4. Imports

One of the first decisions you will have to make is whether to approve the commercial import of a Monsanto oilseed rape (GT73). Member states voted by a simple majority against the proposal in December 2004, clearly indicating that there is widespread dissatisfaction with this product. Imported oilseed rape grains will inevitably escape into the environment through spillage during transport or processing, as has already occurred in Japan. It is important that the Commission re-evaluate this application and prevent imports of GMOs such as oilseed rape that do not have permission to be grown in Europe.

5. GM drugs in our cornflakes

The US Government is currently bringing in proposals that will allow contamination of normal food from outdoor test sites of experimental GM crops including maize. In the US, there are thousands of tests taking place and contamination is almost certainly happening. Many of these test sites include crops genetically engineered to produce drugs. Should even very low levels of accidental contamination occur, this could prove dangerous. The Commission should insist that all crops exported from the USA are tested for all possible GMO contamination by the US authorities before shipments depart.

6. Save our seeds

The previous Commission put forward proposals to allow conventional seed to be contaminated by a small amount of GM material without having to be labelled. This would have led to economic and environmental problems and jeopardises the choice of consumers and farmers. It is also possible that if an adverse effect came to light in the future it would not be possible to trace and remove all affected products. The Commission should bring in legislation that enforces seed labelling at the detection level (0.1%) to ensure proper protection of farmers, the environment and consumers.

7. Better food safety and independent safety advice

The European Communities, in their case at the World Trade Organisation, acknowledge the uncertainties and risks associated with GMOs. However, in the past, the Commission has forced new products onto the European market even though member states have raised these same questions about the risks. European law dictates that the long-term effects must be considered, but this has not been adequately defined. Most industry experimental data supplied for approvals only covers one or two years. The new Commission should ensure that genuinely long-term and independent tests are carried out on GM foods and feeds to ascertain their safety.

The European Food Safety Authority (EFSA) plays a key role in the approval of GMOs, providing opinions on the safety of new foods and crops. However, its opinions to date have all been favourable to the GMO industry. Many EFSA scientists have close working links with the industry and there is clear evidence of the EFSA extending its remit to the benefit of GMO companies. To gain consumer confidence it is important that there is a credible, independent and fully competent scientific body at the EFSA which allows real stakeholder participation (including regions and nature protection agencies).

8. GM Free Regions

An increasing number of regions are requesting the right to determine themselves whether GM crops should be grown and under what conditions. Thousands of areas want to remain GM free. The Commission should assist European citizens in this respect by proposing new EU law that is compatible with these democratic wishes and allow regions self-determination on GM crops.

9. Strict liability for environmental and economic damage

The GMO industry has fought to avoid any financial liability for its products should anything unforeseen happen or, more predictably, other farmers' fields and the environment be contaminated. Therefore, it is important that the Commission introduces strict liability for all GMO operators and ensure that neither the public nor non-GMO food producers bear the costs of contamination or future harmful effects. The de facto exclusion of GMOs from environmental liability has to be remedied; and insurance should be compulsory for GMO operators.

10. Better consumer information

The last Commission improved consumer information about GM products by introducing food labelling and traceability. However, one key piece of information was missing. Most GM products are fed to farm animals and yet consumers are not informed if the dairy, meat or egg products they buy come from animals reared on GM feed. The new Commission should close this loophole and introduce consumer labelling for products derived from animals fed GM feed.

European Environmental Bureau

Eurocoop

Friends of the Earth Europe

Greenpeace

IFOAM EU group

Cosigned by the following national organisations:

Attac, Austria

Genewatch, UK

Foundation on Future Farming, Germany

Fauna society, Hungary

Nimfea Environment and Nature Conservation Association, Hungary

Plataforma Transgénicos Fora do Prato, Portugal