

Consultation on the draft *Scientific opinion on food safety, animal health and welfare and environmental impact of animals derived from cloning by somatic cell nucleus transfer (SCNT) and their offspring and products obtained from those animals*

Response from GM Freeze, London

GM Freeze is very concerned about the possible introduction of products from cloned farm animals into the EU Market.

It is widely accepted that there are no good reasons for commercialising this technology in the EU at the present time. Even the EU biotechnology industry agrees with this point and is apparently supporting a moratorium on cloning.

GM Freeze would like to raise the following issues, which we feel the EFSA opinion either ignores or underplays:

Human Health Implications

The EFSA opinion summary states:

“Provided that unhealthy clones would be detected at veterinary inspections and quality controls and thus be prevented from entry into the food chain, the currently available data indicate that food products from clones of cattle and pigs and their progeny are as safe as food products of livestock derived by conventional breeding.”

Given that key changes in the cloned animals and their progeny that might impact on human health may not be obvious to livestock farmers in a commercial setting, we would expect EFSA to produce some analysis of what monitoring or testing could detect potentially harmful abnormalities in cloned animals. There is a risk that animals don't present. In the absence for such capacity, GM freeze believes that cloning should not be permitted for commercial production or the import of cloned products to be allowed into the EU.

Animal Health and Welfare

The opinion states that because research has been carried out in controlled environments, “the effects observed and recorded may not reflect the conditions of husbandry that exist in everyday production systems.”

We believe that this statement indicated a lack of real data from practical farming situations. NO further progress towards commercialisation of products from cloned animals, their progeny or the cloning of animals should take place until this gap is filled by well designed and thorough research that looks for unexpected impacts as well as the more likely ones. The duration of such research should be such that long-term impacts, such as those experience by Dolly the sheep, have had a chance to emerge.

Animals need to be protected form the worst impacts of the cloning process during research stages by means of close monitoring and strict adherence to a code of good practice under pinned by law, which EFSA should help develop.

Health of Progeny

Section 4.2.4, line 1034 states, "No studies on the welfare of the progeny of clones have been reported in livestock species." GM Freeze is very concerned about this lack of basic research. EFSA should require that research on the health and welfare of all animals involved in the cloning process before further moves to commercialisation are made.

Impact on the Environment and Genetic Diversity

GM Freeze is very concerns about the lack of research into the possible environmental impacts of cloning animals. Of major concern would be the escape into the wild of cloned animals that were able to out

compete their wild counterparts. Cloned GM farmed fish would be a particular concern. If they were larger and more powerful they might be able to compete more strongly for spawning sites thus preventing wild fish from reproducing. Subsequently, the cloned fish may turn out to be not well very adapted to certain aspects of life in the wild and die out (eg susceptible to disease or fungus). At this point the gene pool would already be contaminated and wild fish reduced in number because of being displaced from spawning grounds by larger cloned fish. Risks from escapes of cloned mammals and birds would also need to be thoroughly examined before commercial scale cloning is approved.

The selection and cloning of particular individuals for cloning could lead to a loss of genetic diversity and leave animals potentially weaker in respect of resisting non targeted diseases. The maintenance of genetic diversity within the breeds of farm animals is vital for the health of the breed and the long-term viability of livestock and poultry farming. GM Freeze believes that the conservation of generic resources should be a legal requirement for all those involved in cloning.

It is very important that the ability to clone individuals from rare breeds should not be used as an excuse not to maintain diversity and increase animal numbers through conventional breeding. The safest and surest way to maintain diversity is to maintain a vibrant population for every breed.

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