Whatever happened to “Plan A”? 
Marks and Spencer and GM animal feed

May 2013

Introduction
On 12 April 2013 Marks and Spencer announced that it would “no longer stipulate the use of non-GM feed in our fresh meat supply chain”. The move ended a 12-year commitment to a policy on source non-GM animal feed for the company's fresh animal products, saying, “This change in policy is absolutely necessary because there is now a much reduced supply of non-GM feed available to UK farmers.”

Tesco made a similar announcement the previous day, and there was a clear sense that M&S was hoping Tesco might take the brunt of the criticism.

The move follows the company's decision to join the Roundtable on Responsible Soya (RTRS) several years previously. The RTRS certifies GM soya as “responsible” despite the growing body of evidence that it is far from it.

Soya supply and M&S
Non-GM soya destined for the UK market, including the company’s animal feed, is almost entirely grown in Brazil. Contrary to the impression given by the company’s 12 April statement there has been no significant reduction in the amount of non-GM soya being grown in Brazil in the last year. At least 20% of last year’s harvest was non-GM, although not all of it was certified because many farmers need assurance of sales in order to justify the the expense of certification.

This means there is scope for increasing the volumes of certified non-GM soya available for the UK market by certifying the part of the crop that is not currently being certified as non-GM, and to do this supermarkets need only order non-GM soya so it will be grown and certified. The only reason M&S could not obtain certified non-GM soya appears to be its lack of activity and ambition in the market. Rival Waitrose maintains its policy for poultry and eggs by securing long-term supply contracts for non-GM soya, as do an increasing number of companies in the EU China.

Very long delays for ships awaiting loading at ports in Brazil caused problems for non-GM supply over the last 12 months. Typical waiting times were 20-50 days stretch to over 90 days during 2012/13. By April 2013 the premium for non-GM soya had risen to 25% (from around 10% twelve months previously), making non-GM nearly £100 per tonne more expensive.

Delays were reflected in rising prices for GM and non-GM soya, but the non-GM market appears to have been hit more heavily. In addition the market for non-GM soya in the UK does not appear to function as well as in mainland Europe where many companies successfully label animals products “without biotech”. Certified non-GM supplies to the port of Glasgow resumed in late April, and quoted premia there fell to 5.8% quoted in May, but supplies in England are more difficult. The reasons for the discrepancies in the UK market compared to the EU market are not clear.

M&S appears to have used a temporary supply problem as an excuse to renge on a long held promise to its customers. Other options were open, including at the very worst a temporary suspension of the ban on GM feed until supplies resumed. Instead M&S decided to follow Tesco.

Plan A
Plan A is Marks and Spencer’s sustainability and ethical strategy. The company says:

“We’re doing this because it’s what you want us to do. It's also the right thing to do. We're calling it Plan A because we believe it's now the only way to do business. There is no Plan B.”
Launched in 2007 Plan A claims the company will work “with our customers and our suppliers to combat climate change, reduce waste, use sustainable raw materials, trade ethically, and help our customers to lead healthier lifestyles”, placing sustainable development and ethical trade as key elements to the company’s business.

M&S set itself a target to meet 180 commitments in Plan by 2015, but the commitments on animal feed in Plan A are very limited and misleading, and it relies on customers having little or no understanding of the issues.

Plan A and soya (Point 16.16)

“We’re members of the Roundtable for Responsible Soy (RTRS) and the Soy Moratorium, which commits us to not buy soy from the Amazon Biome, an area vulnerable to deforestation. Most of the soy we use is in animal feeds and we’ve set up an independent Animal Feed Advisory Group to advise us.”

The RTRS certifies GM soya as “responsible” despite the growing body of independent evidence demonstrating its negative impacts on human health, wildlife, the environment and rural populations. GM soya barons in Argentina often displace family farmers and local communities to make way for vast industrial monocultures. Such activities still persist as the area under soya continues to expand.

GM soya dominates production in Argentina, Paraguay and many States in Brazil. The only crop grown in GM soya estates is Monsanto’s Roundup Ready (RR) soya, which is tolerant to the herbicide glyphosate. This enables farmers to spray, including from airplanes, the growing soya crop and kill the weeds without harming the crop plants. Overdependence on glyphosate in RR soya has directly led to the development of weeds with resistance to the herbicide, including Johnsongrass, described by some as the worst weed in the world.

Farmers now have to find a way to control these superweeds. This can mean applying glyphosate in larger and more concentrated amounts. Neighbouring communities can be hit by spray drift, and doctors in Argentina report rising frequencies of birth defects in these areas. Glyphosate is also increasingly used in mixtures or rotation with other herbicides, including 2,4-D and glufosinate ammonium. These, like glyphosate, have dubious safety approvals.

Wildlife also suffers in and around RR crops. Glyphosate is especially toxic to amphibians, and research in Argentina demonstrates that the herbicide can impact on the development of tadpoles. The destruction of weeds can also have an indirect impact on wildlife by destroying food supply, habitat and cover in and around RR crop fields. In the US the advent of RR soya and maize has led to a massive reduction in numbers of milkweed in fields, and this harms monarch butterfly numbers because the plant is the preferred food for their caterpillars.

The use of GM soya by M&S does not sit well with its ethical stance in Plan A. Even if it was acceptable, RTRS certified soya (GM and other) amounted to a mere 1 million tonnes in January 2013, less than 0.4% of total 2011 global production, so it seems very likely M&S will be buying GM soya from unsustainable sources. By opting for GM soya and joining the RTRS M&S is hitching itself to an unsustainable and unethical system of production – and misleading its customers.

Plan A and non-GM food (Point 16.13)

“Non-GM food: Achieved
Aim: Maintaining our non-GM M&S food policy.
Progress: We’ve maintained our policy of only using non-GM ingredients in M&S food.”

M&S announced it maintains its policy on non-GM food ingredients, but consumer research has
repeatedly shown that the UK public is equally concerned about the use of GM animal feed, and they want clear labels to help the see where GM feed is used.

The M&S claims to have “achieved” non-GM food are misleading, and in any case its use of soya in food is tiny compared with the amount of GM soya in the animal feed required to produce meat, milk and eggs. Figures from Dutch producers show just how much soya is needed to produce meat and milk:

- 1 kilogram beef requires 0.31 kilograms of soya meal
- 1 kilogram chicken requires 0.619 kilograms of soya meal
- 1 kilogram pigmeat requires 0.916 kilogram of soya meal
- 1 litre of milk requires 0.028 kilogram of soya meal

The current policy shift away from non-GM soya is completely out of tune with Plan A and was clearly motivated by financial considerations using temporary supply problems as a smokescreen.

*Sustainable farming: Achieved/ongoing

Aim: Engaging our producers of fresh meat, dairy, produce and flowers in the M&S Sustainable Agriculture Programme by 2012. By 2015 we will have also engaged farmers producing agricultural raw materials for M&S food in the programme.

Progress: We’ve engaged our fresh meat, dairy, produce and flower producers in developing an overall sustainability framework, called Farming for the Future, by holding meetings, running Supplier Exchange best practice programmes, attending regional Agricultural Shows and publishing newsletters and conducting opinion surveys. We’ve supported these actions by rolling out our Field to Fork and TRAK traceability systems (see commitment 7.2). We’ve decided to re-word the 2015 part of this commitment to more accurately reflect our plans. Our new wording is, “By 2015, working with independent consultants, though our M&S Farming for the Future programme, we will have engaged with farmers producing agricultural raw materials for M&S food.”

There is no indication here that M&S has engaged with its fresh meat and milk suppliers to outline the additional problems associated with GM soya in South America or worked with them to maintain the ban on GM in animal feed during the recent supply problems. Indeed the company’s ongoing dependence on GM soya imports is not sustainable, in addition to the reasons outlined above, because of the lack of agricultural biodiversity, short rotations and impossibility of returning vital nutrients to the soil (every million tonnes of exported contains 7,000 tonnes of phosphate and 17,000 tonnes of potash, which drains South American soils of fertility).

Plan A and pesticide residues (Point 16.11)

*Pesticide residue-free food: Behind plan

Aim: Work towards M&S fruit, vegetables and salads being 75% pesticide residue-free by 2015 and 100% pesticide residue-free by 2020.

Progress: During 2011/12 we commissioned independent research to develop a more accurate and representative way of measuring how much of our produce is pesticide residue-free. However, so far, this work has not been successful and we plan to continue with this research next year. For 2011, using our existing method of testing which deliberately targets produce where we are more likely to find pesticide residues, 47%* (last year 45%) of M&S fruit, vegetables and salads were residue-free at or above 0.01 parts per million.”

While it may be laudable that Plan A makes much of Marks and Spencer’s policy to remove harmful pesticides from its approved list and reduce the incidence of pesticide residues in fruit, vegetables and salad, it is unclear why it stops there.
Pesticide residues inevitably result from spraying the herbicide on the growing crop. GM soya has a maximum residue limit for glyphosate of 20mg/kg, but the limit was raised to 200 times its 1990s level to accommodate the use of Roundup on GM crops, and the EPA is currently considering proposals to double it again.

M&S does not appear to have considered the impact of its policy shift toward GM animal feed on residues of glyphosate in milk, meat and eggs. It is unclear if it will monitor glyphosate residues in animal products or change policy if residues are found or publish residue data. It does not appear to be prepared to label products to help shoppers see which products were produced using GM feed. These actions would seem to be perfectly compatible with ethical principles in Plan A.

Key reading
Much of the information in this briefing comes from a number of fully referenced GM Freeze publications. For further information see [www.gmfreeze.org](http://www.gmfreeze.org) for:

- *Roundtable on Responsible Soya - The certifying smoke screen*
- *Weed Resistance in RR crops - an update*
- *Thirteen Reasons Why the Roundtable On Responsible Soy Will Not Provide Responsible or Sustainable Soya Bean Production*
- *Herbicide Tolerance and GM Crops - Why the world should be ready to round up glyphosate*
- *Resistance is Growing: GM herbicide tolerant crops and resistance in weeds*

What you can do
Press Marks & Spencer and all UK supermarkets to require suppliers to use non-GM feed and provide clear labels on animal products. See our actions for full details at [www.gmfreeze.org](http://www.gmfreeze.org).

Notes
1. Marks and Spencer, 12 April 2013. “Animal feed update”
3. RTRS, January 2013. “Responsible soy reaches first million tons certified”