This briefing examines a report published in October 2008 – “Do European Consumers Buy GM Foods” – which was based on research funded by the European Commission (see www.kcl.ac.uk/schools/biohealth/research/nutritional/consumerchoice/downloads.html).

GM Freeze has several concerns about this report, particularly because it makes no attempt to look at the relationship of trust between UK consumers and where they shop. It details the strong no-GM policies of many retail chains but then fails to examine what people feel about these promises and how it affects the way they shop or the trust they place in the word of UK retailers. If your supermarket pledges not to have GM ingredients, the incentive to read every label may be reduced, especially as many people are time poor and/or have children accompanying them in the supermarket and thus will be less inclined to read labels in small fonts on the backs of packs.

Below we set out 8 specific criticisms of the Chapter of the report relating to the UK.

1. Bias within the research teams
The team that carried out the research across the EU includes members who sit on the panel of a very pro-GM lobby group, CropGen, namely Professor Tomasz Twardowski and Professor Vivian Moses (see www.cropgen.org/expertview.html). In addition, a representative of the pro-GM crops lobby group Europabio was also part of the research consortium that carried out the project.

2. The use of immoderate and value laden language in the report
The positive attitude of the researchers to GM crops and their negative response to those bodies and institutions which support a precautionary approach comes through very strongly in the language used in the text of Chapter 16 on the UK. Several comments lacked supportive evidence, were inappropriate for a social science report and generally lacked objectivity. For example:

- On the media coverage:
  “Before long, sections of the media were generating scary headlines (some very scary indeed).”

- On the Agriculture, Environment and Biotechnology Commission:
  “In June 2000, the Government set up the Agricultural and Environmental Biotechnology Commission (AEBC) comprising all interested parties in the hope that a resolution might follow. It did not and after four years of fruitless wrangling – and a public consultation on their effectiveness – the AEBC was abolished in April 2005 un lamented.”

- On retailers:
  “However, as obligatory labelling did not come into force until April 2004, consumers had only the retailers word that their own label products were GM-free.” (also see later comment)

- On GM Nation? The Public Debate:
  “The year 2003 witnessed a national debate under the title GM Nation?. Many meetings were held up and down the country, some organised by the national or local government bodies, others by anti-GM pressure groups. There were “narrow but deep” inquiries as well as others which were presumably “wide and shallow”.”

- On food labelling:
  “The ‘GM-free’ label is not common in the UK. It appears most often on packs of soya milk:
the rubrics included ‘Organic Unsweetened Soya’.

• On Prince Charles:
  “Most recently, following the Prince of Wales’ forthright warning that GM crops risk causing the biggest-ever environmental disaster (9), the Environment Minister robustly rejected the Prince’s statements, saying it was ‘easy for those with plentiful food’ to ignore Third World hunger and that the Government would press ahead with GM-crop trials and look at moving to a more ‘liberal’ regime in Britain, unless scientific evidence showed that the crops had done harm (10). Ministers were said to be privately furious about the attack, which they believe risks becoming a constitutional crisis.”

The last comment in this section is more in keeping with a political diary in a newspaper than a scientific report.

3. Examples of Inaccuracy
There are several places where the authors of Chapter 16 have clearly failed to check the information included, for example:

1. “The Food Standards Agency of Defra is specifically concerned with food imports including those with GM ingredients.”

   Comment: The FSA is an independent executive government agency and is not part of, or answerable to, .

2. “As ‘regions’ of the UK, Scotland and Wales may be in a position to set their own coexistence criteria.”

   Comment: The regulation of GM test sites, food and feed labelling and coexistence and liability are devolved to the administrations in Wales, Scotland and NI. All three countries will produce separate legislation on coexistence and economic liability for commercial GM crops. Indeed Northern Ireland has already consulted the public on this issue and Wales has announced that it will do so shortly.

3. “However, as obligatory labelling did not come into force until April 2004, consumers had only the retailers word that their own label products were GM-free.”

   Comment: The first GM labelling of GM ingredients was introduced in 1999 as The Food Labelling (Amendment) Regulations 1999 transposing EC Regulation 258/97, which required food ingredients to be labelled above a threshold of 1%.

4. Examples of Unsubstantiated information in the Text of Chapter 16
1. “However, in 1997 he appointed an Environment Minister (dismissed in 2003) who was openly and strongly opposed. That Environment Minister was responsible for the Farm Scale Evaluations of three GM-crops compared with their non-GM counterparts which ran from 1999 until 2003, with results published in 2003 and 2004. Many scientists criticised the basis for running the evaluations and the criteria used for assessing the results. Nevertheless, one crop (a herbicide-tolerant maize) did receive open government approval but was withdrawn by the company involved.”

   Comment: This suggests that criticism of the Farm Scale Evaluations (FSE) methodology, experimental design and interpretation of the results was confined to those who thought that GM crops should be approved when, in fact, there were critics from other quarters, particularly relating to the statistical sensitivity of the FSE, the failure to look at yields and the handling of the data on maize after atrazine was banned. See www.foe.co.uk/resource/reports/science_smokescreen.pdf and www.foe.co.uk/resource/press_releases/friends_of_the_earth_hits_04032004.html.

2. “Rarely, restaurants post a notice in the window, or add a footnote to their menus, affirming that all their foods are GM-free. However, we have also found some which indicate on their menus that GM foods may be present”.

   Comment: The UK regulation of GM labelling and traceability cover food sold in restaurants,
cafes, canteens and fast food outlets and require that all GM ingredients, including oil, be labelled on menus or at point of sale (personal communication from the FSA). The use of “may be present” on public information is not permitted.

3. “Farmer opinion has for several years been rather favourable to GMOs in the sense that farmers say they wish to make their own choices in the light of market acceptability.”
   **Comment:** This claim is not referenced.

4. “It is nevertheless worth noting that some farmers growing organic crops do so strictly for commercial reasons, without philosophical motivations; just how large is that proportion is a matter for debate. Some organic farmers express an interest in GM-crops, perceiving benefits for their organic practices from transgenic technology; they would like to see GM-crops permitted in organic agriculture.”
   **Comment:** This claim is not referenced.

5. “An Open University study based on interviews and workshops with 50 farmers and members of farming organisations found that farmers are in favour of growing genetically modified crops in Britain despite public fears over their safety. Farmers and farming industry leaders believe GM technology is the only way to produce enough high-quality food as the country’s climate changes and the population soars. Farmers claim that using GM-crops will help them cut down on herbicides and pesticides while increasing the amount of food that can be harvested (25).”
   **Comment:** This study is not reported accurately. The OU study only spoke to farmers who had grown GM crop trials and the report fails to make this clear.

5. **The failure to review literature of other consumer attitude surveys**

   One obvious omission from the report is a review of similar studies to support the methodology selected for this study and review results. The selection of questionnaire subjects (UK citizens from academic institutions who have visited the US) is curious and not fully explained. Some reference to previous studies of the behaviour of people on holiday abroad and their food purchasing would have helped readers validate the choice of this cohort. The key question which was not addressed is whether food purchasing changes when people travel abroad for whatever reason.

   The section of the questionnaire states:

   "It has, however, been possible to conduct anonymous polls in an academic context in which all students and staff in eleven UK universities were invited to reply to an online questionnaire; more than 1,500 responses were received.”

   The respondents to this on line poll were therefore self-selecting and this fact needed to be acknowledged and reflected upon when interpreting the results. Indeed reference to other studies involving self-selecting respondents and how this influences the results and interpretation would have been helpful, particularly as the sample is skewed in several ways (eg, 60% came from the SE of England, 80% were under 40 and 64% were women).

   In addition, the report appears to base some of the survey methodology on the unsubstantiated or referenced assertion that Asian households buy proportionally more GM oil in the UK and therefore, “Because of the perceived higher possibility of Asians coming into contact with GM-labelled foods (see page 16-7), it was also noted when there were Asian participants.” See also the comments on the selection of focus groups below.

6. **The drawing of conclusions with little or no evidential support**

   The report draws a whole series of conclusions that are speculative rather than based on new evidence presented or reliable evidence drawn from elsewhere. The use of the phrase “straws in the wind” underlines the weakness of the evidence base. For instance:
“Future prospects
At the time of writing (August 2008), the UK as a whole seems closer than ever before (but not necessarily very close) to an acceptance of GMO technology as normal.

“Straws in the wind include:

“(a) indications that fewer members of the public than hitherto express concerns when asked directly about GMO matters while unprompted GM issues do not appear high on the list of those generating the greatest unease;”

Comment: BSE also has the same response according to the FSA opinion survey to GM (FSA tracker survey September 2008 www.food.gov.uk/multimedia/pdfs/trackersurvey0908), which suggests that the public feel the threat from BSE has reduced. Reduced public concern about GM ingredients may be due to the fact that very few products on supermarket shelves contain GM ingredients. In addition, there is evidence that the public is confused by food labelling (see www.food.gov.uk/news/newsarchive/2009/feb/pafi).

“(b) the UK government has shown itself generally fairly favourably disposed to the development of the agricultural biotechnology as well as to the use of GM-ingredients in food; a recent radio interview with the Environment Minister (32) made the governments positions very clear (Appendix 8, page 16-59);”

Comment: This is based on one short interview with Phil Woolas MP (then Defra Minister and now Minister for borders and immigration) on the Radio 4 Farming Today program.

“(c) since mid-2007, the UK media have adopted a far more favourable view of agricultural biotechnology and its products than they had previously; radio and television presenters as well as print journalists have become more sympathetic and less aggressively antagonistic. This is likely to affect public opinion;”

Comment: The survey of media gives no details of methodology or how the content was assessed. The data covers just two years and provides no comparison with previous coverage or references to previous work of this type.

“(d) the growing spate of articles and programmes critical of organic farming tends also to reduce anti-GM sentiments which are widely associated with the promotion of organic activities;”

Comment: The report provides no examples or evidence to support this statement.

“(e) the widespread talk of food crises means that people are looking for more solutions, with a growing awareness of the potential of transgenics to help in solving major problems;”

Comment: The report provides no examples or evidence to support this statement.

“(f) the extent globally of transgenic crop plantings is not without its effect in the UK;”

Comment: The report provides no examples or evidence to support this statement.

“(g) nor is the adoption of the technology by countries traditionally close to the UK (most recently some of the Australian states;”

Comment: The report provides no examples or evidence to support this statement.

“(h) those pressure groups and other prominent individuals arguing an anti-GM case are sounding ever more repetitive and ever less convincing;”

Comment: This is a purely subjective comment, which has no place in a scientific report.

“(i) the seed companies are showing the first signs of renewed activity in the form of field testing in the UK;”

Comment: The report provides no examples or evidence to support this statement. Indeed, there have only been three GM test sites in the last three years in the UK, including 2009 to date, which suggests that industry activity remains low.
“(j) the small number of labelled GM-products on sale in many UK retail food stores sell well (or they would long since have been removed) and have generated no adverse consumer reactions;”

Comment: The statement that there has been “no adverse” reaction should be qualified by reference to the findings in the report and not as a throw away comment for the whole of the UK.

“(k) UK supermarkets are beginning to indicate that they are thinking again about the possibility of GM-ingredients following their removal from their own-label products nearly ten years ago. The clearest statement was made in a BBC television interview in October 2007 by Mark Price, Managing Director of Waitrose (32), a major UK supermarket chain which is among the foremost promoters of organic foods and the first to remove GM-products from their own-label items (see Appendix 9, page 16-60);

“(l) there is recognition in a growing number of quarters of the approaching crisis in the European livestock industry if the EU fails rapidly to approve the new US strains of GM soya and other food grains;”

Comment: In fact, the words of Mark Price in an interview with Stephen Sackur as reproduced in full in the report. The relevant comment is:

Stephen Sackur, BBC Hardtalk
“Wait a minute: what you are saying is very interesting. You are you saying that Waitrose is actively considering right now putting GM foodstuffs into your stores.”

Mark Price, managing director of Waitrose
“No we are not thinking of that right now. What we are thinking about is what happens if world supply switches predominantly to GM and we have no option but to source GM to put into the products that we have.”

“(m) writing in The Grocer, Kevin Hawkins, then Director-General of the British Retail Consortium, concluded his article: Then, finally, there is an issue coming to the boil that, when it does, will dwarf all else – the rehabilitation of GM food. The science has moved decisively in its favour, while the government is hoping someone (the industry) will take the plunge and start selling GM lines again. When that happens the tabloids will scream, Flat earthers will rage, Prince Charles will make a speech. But it’s coming, all the same (11);”

Comment: Purely subjective and personal comment from someone with a long history of such comments.

“(n) both the ministerial and the media responses to the Prince of Wales interview (see page 16-4) suggest a profound revision of UK attitudes to GMOs which may nevertheless still take time to come to fruition.”

Comment: There is no evidence presented in the report that the comments of politicians or the media have substantially changed public opinion on GM in the last few years to justify this comment.

7. The design of questionnaires
One of the major differences between North America and the EU in GM policy is the statutory requirement to label all GM ingredients in food and animal feed in the EU, which does not exist on the other side of the Atlantic (see Q 16 below). Given this fact, the participants would have the greatest difficulty answering questions 17-20 of the questionnaire and the answers provided may not reflect how they behave in the UK. Indeed, none of the questions asked attempted to find out what the respondents did when at home. The value of this quantitative research is therefore extremely limited.

“16. Are you aware that in North America many processed foods and some whole foods are GM/GE or are derived from GM/GE sources, and are not labelled to show that?
17. Do you seek to identify GM/GE products when you buy food in North America?
18. With respect to GM/GE foods in North America, do you tend to choose them, avoid them or neither?
19. If you choose GM/GE products in North America, do you do so because you perceive them to be of:
20. If you avoid GM/GE products in North America, do you do so because you perceive them to be:

8. Selection of Focus Group Participants
Annex 7 of chapter 16 of the report gives a description of 4 GM focus discussion groups. This reveals that the four groups compromising of 29 in total included 5 people of Asian or British Asian decent plus another who had one Asian parent. Thus the percentage of in this sector of the population in the focus group was 19% compared with a UK national figure of 4.4% (includes ethnic Chinese) (see www.statistics.gov.uk/CCI/nugget.asp?ID=273). The selection of a high proportion of people who were Asian or Asian British was explained, “It was also noted where there were Asian participants due to the perceived higher possibility of Asians coming into contact with GM labelled foods.”

How this decision was made is not explained in the report. As the theory that people of Asian ethnic background are more likely to use GM oil appears to be largely hearsay, the decision is all the more strange, particularly as the report on the focus groups does not mention GM cooking oil at all.

Concluding Remarks
The report makes no attempt to look at the relationship between consumers and where they shop in the UK. It details the strong no-GM policies of many retail chains but then fails to examine what people feel about these promises and how it affects the way they shop and the trust they place in supermarkets to deliver non GM policies. If your supermarket pledges not to have GM ingredients the incentive to read every label may be reduced especially as many people are time poor and/or have children accompanying them in the supermarket.

In summary, we feel that this report has added very little to out knowledge of consumer concern and behaviour towards GM ingredients in the UK food chain.

The latest Eurobarometer poll shows that a majority of EU citizens (58%) do not support the use of GMOs in food production and concern about GM in food in higher than compared to other forms of biotechnology (see http://ec.europa.eu/public_opinion/archives/ebs/ebs_295_en.pdf).

In the UK people are slightly less concerned about BSE than GM according the FSA’s Tracker Survey (see Q3a in http://www.food.gov.uk/multimedia/pdfs/trackersurvey0309.pdf) but, broadly, concern is at the same level. This may be due to people’s belief that both problems are solved because of the actions taken to deal with the problems and therefore they can relax. Any new information on the safety of GM cooking oil or the health impacts of animal feed or the environmental and social impacts of soya production could spark a new wave of public concern.