



David Jefferies  
Food Standards Agency  
Aviation House,  
125 Kingsway  
London WC2B 6NH

By email [GM.Inquiries@foodstandards.gsi.gov.uk](mailto:GM.Inquiries@foodstandards.gsi.gov.uk)

28 February 2013

Dear Mr Jefferies,

**re: Consultation on Harmonisation of GM-free Labelling in the EU**

Thank you for the opportunity to comment on the EU proposals on the Harmonisation of GM-free Labelling. We have responded to the five questions set out in your letter of 30 January 2013 below.

**Q1: Is there a need to promote and harmonise the use of “GM-free” labels?**

Yes. There has been strong public support for comprehensive GM and non-GM labelling for many years. The recent FSA sponsored research on *Consumer Attitudes to GM Labelling* confirms that members of the public want GM-free labels to enable them to make informed choices when shopping. It is important that the GM-free labelling system is consistent across the whole EU to ensure that traded products are clearly labelled and to enable people to avoid GM products whilst travelling in the EU.

**Q2: Is the phrase “GM-free” the best phrase to use or could others be used e.g. “free from GM”?**

GM-free is clear and not easily misunderstood, so we would favour it above other options. We recommend that labels should be on front of packs and large enough to be visible rather than on the ingredients list on the back of the pack. This should also apply to GM labelling. This was a clear outcome of the recent FSA of consumer attitudes research published in January 2013.

**Q3: Would this type of claim be more useful for primary produce (e.g. meat, milk, eggs) than for processed foods?**

Consumers have indicated that they want clear labelling in regards to the use of GM ingredients on all products, including primary products (meat, milk, eggs and fish). At present processed food containing GM ingredients must be labelled, and it would be consistent to allow the GM-free labels to be applied to these products as well, providing all ingredients are covered by the GM free labelling regulations – if one was GM then the product could not be labelled GM-free. There should be a legal requirement for GM-free claims to be backed up by full traceability for animal feed and ingredients in processed food to the point in the supply chains where certification of GM-free status of raw ingredients was available.

Labelling on animal feed would need to be clearer and larger to make it easy to distinguish between non-GM and GM feed and to ensure the integrity of the system.

**Q4: If criteria for “GM-free” claims are to be developed how strict should they be?**

GM-free should mean that no GM has been detected in raw ingredients used in the production of food or feed at the best currently available/reliable limit of detection. GM-free labels should apply to ingredients where no GM DNA or protein can be detected (such as vegetable oil and emulsifiers), and full traceability would be required to allow this to be enforced. The limit of detection should be

reviewed frequently to ensure it keeps up with developing technology, and there should not be any threshold for GM to be permitted in food and feed labelled GM-free.

Consumers expect that honey used as an ingredient in GM-free food is itself GM-free, and therefore beekeepers must be included and given protection in coexistence rules to avoid GM contamination of non-GM crops.

**Q5: Would any new costs be incurred by food businesses if formal criteria were introduced for making “GM-free” and similar claims?**

Full traceability of ingredients is already a requirement of the GMO Traceability and Labelling Regulations 1830/2003, and therefore most ingredients that would go into the production of GM-free food or animal products should already be fully traceable. The traceability should include certified analysis results of the original raw materials to demonstrate the absence of any GM. Thus additional costs for paper work and analysis are already included if the current laws are being complied with.

Labels and packs would have to be re-designed, but this would be a routine matter if the company intended to market their products as GM-free, and we think they could feel confident that they would recoup this outlay.

The main costs of GM-free labels would be the set-up costs to source GM-free ingredients and establishing reliable traceability schemes capable of withstanding fraud. The cost to the sourcing of non-GM ingredients which would be similar to those needed to ensure a safe and reliable source for any ingredient regardless of GM content. The market price of non-GM feed or ingredients might be higher but this is a business decision and not a cost of complying with the regulations.

Normal quality assurance inspections and sampling would be required to ensure that standards are maintained by the GM-free supplier, but this should be routine good practice in all supply chains to ensure compliance with the GMO Traceability and Labelling regulations and should not present any additional costs. Extra costs may be incurred by suppliers to establish separate handling facilities for GM-free ingredients, if their factory handled both GM and GM-free ingredients, to reduce the risk of cross contamination.

I confirm that GM Freeze is happy for our submission to be placed in the public domain.

Yours sincerely,



Pete Riley  
Campaign Director