

27 October 2015



## **GM Freeze stakeholder submission to the Food Standards Agency regarding the European Commission proposal to allow Member States to restrict or ban the use of authorised GM food and feed products.**

GM Freeze is a non-profit group that campaigns for a moratorium on GM in food and farming because we want to help create a world in which our food is produced responsibly, fairly and sustainably. GM Freeze is supported by a wide alliance of organisations and individuals sharing our concern about the impact of genetic modification on people, animals and our natural environment.

### **General points on the proposal**

GM Freeze regards the European Commission proposal for GM food and feed opt-outs as seriously flawed. The legal basis of any bans enacted under the proposal appears questionable and the proposal is an unhelpful distraction from the urgent need to make the GM authorisation process more democratic.

GM Freeze supports rapporteur La Via's recommendation to reject the proposal. We also support amendments two and three, tabled by MEPs for the plenary debate on 28 October, calling on the European Commission to submit a new proposal and halt GM authorisations until such a proposal is agreed.<sup>1</sup> However, we do welcome the opportunity that the proposal offers for consideration of issues beyond the narrow definition of safety currently considered by the European Food Safety Authority (EFSA).

Dialogue about GM in the food chain has become highly polarised and focused on the question of whether a particular crop or foodstuff is "safe" or "unsafe". Such an approach fails to recognise the cumulative impact of widespread uptake of particular GM crop traits (especially herbicide tolerance) and is out of step with much broader consumer concerns.

Consumers are concerned about GM for a variety of ethical reasons that are beyond the scope of EFSA assessments. GM cultivation has been shown to reduce biodiversity<sup>2</sup> and has been specifically linked to the 90% decline in the population of the monarch butterfly<sup>3</sup>. Most GM crops are heavily sprayed with glyphosate, now classified as a probable human carcinogen<sup>4</sup> and glyphosate resistant weeds are now commonplace<sup>5</sup>. The patenting of GM crops shifts control from farmers to agrochemical corporations. These issues motivate many consumers to choose GM free, regardless of where the crops in question are grown. Therefore, GM Freeze welcomes the ways in which this proposal recognises consumer and other interests as valid considerations in decisions around GM.

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## Questions posed by the Food Standards Agency

**1. In what ways will different industry sectors be affected by this proposal? (Please provide supporting data).**

Although GM Freeze's membership includes both conventional and organic farms, retailers and others working along the food chain, we are not an industry body so have no comments on this point.

**2. What is the current price per ton of the different types of GM feed and non GM feed?**

GM Freeze is not an industry body and trusts that others will provide accurate information in this area. However, we are concerned to note the prominence of this question in the call for submissions. Consumer demand has a huge influence on wholesale prices and the invisibility of GM animal feed in the finished food products it goes to produce (meat, eggs, dairy products) means that consumers are currently prevented from exercising choice in this area.

**3. Do you foresee any additional costs or benefits (e.g. relabelling, transport, greater separation of GM/non-GM, disposal etc.) that may arise from this proposal? (Please provide information showing the extent of these costs or benefits broken down by activity).**

More effective segregation of GM and non-GM animal feed would bring a significant benefit to consumers and to the farmers, manufacturers and retailers who want to give their customers real choice.

The Food Standards Agency's own research published in 2013<sup>6</sup> found that "Participants were generally unaware of the use of GM animal feed by farmers. Once made aware of its use, they typically considered that products from animals fed GM feed should be labelled, consistent with previous FSA research".

The same study also indicated that consumers expected industry to bear any costs of labelling or (by inference) segregation. GM Freeze agrees that such costs should not be passed on to consumers, but also that all costs associated with GM farming should be borne by those who choose to profit from it. Thus, the balance of segregation costs must shift towards the producers and traders of GM crops and away from those seeking to maintain a GM-free supply line. If the commission's proposal were to lead to a proper review of segregation processes and costs, GM Freeze would welcome that development.

**4. Do you foresee any risks or uncertainties in relation to this proposal?**

The legal basis of the proposal has been questioned by bodies with more expertise than our own. GM Freeze is very concerned about the severely restricted range of justifications that the proposal offers for member states wishing to ban GM food and feed imports. Similarly, the requirement to respect internal market rules and WTO trade obligations may make the entire proposal unworkable.

Looking more broadly at the issue of national and regional decision-making on GM authorisations, GM Freeze has significant concerns about how any such bans can be truly enforced against contamination. There are many significant examples of GM contamination of non-GM crops and commodities.<sup>7</sup> In this context, it is difficult to see how national bans on GM crops could ever be enforced to a degree that would give consumers real confidence.

Politically, this proposal was intended to help "unblock" the European Union's GM approval process. As with the crop opt-outs, it will only succeed in doing so if the member states choosing to ban either vote to approve GM imports into their neighbours' territory, or abstain and allow those states that are politically supportive of GM to approve in effective isolation. This is a fundamentally undemocratic process that will do nothing to improve consumer confidence.

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**5. To what extent are there substitutes available for GM feed? What are the barriers to their successful use?**

Consumers are told that non-GM feed supplies are limited but without effective segregation it is impossible to determine the relative impacts of cultivation and logistics. Whatever the balance, what consumers want it to see less GM cultivation, and their own right to choose through labelling of GM-fed meat, eggs and dairy products.

GM Freeze acknowledges the EU's dependency on overseas supply of animal feed as a very significant risk to the UK farming industry. Many of our members are actively involved in work to improve the EU's own production of animal feed and some also campaign for a reduction in the consumption of animal products.

Liz O'Neill  
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## References

<sup>1</sup> <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+AMD+A8-2015-0305+002-003+DOC+PDF+V0//EN>

<sup>2</sup> Defra, 14 May 2007 "The Farm Scale Evaluations"  
<http://webarchive.nationalarchives.gov.uk/20080306073937/http://www.defra.gov.uk/environment/gm/fse/>

<sup>3</sup> Pleasants JM, Oberhauser KS, 2012. "Milkweed Loss in Agricultural Fields because of Herbicide Use: Effect on the monarch butterfly population". *Insect Conservation and Diversity* 6(2):135–144 doi:10.1111/j.1752-4598.2012.00196.x  
<http://onlinelibrary.wiley.com/doi/10.1111/j.1752-4598.2012.00196.x/abstract>

<sup>4</sup> International Agency for Research on Cancer Monographs Volume 112: evaluation of five organophosphate insecticides and herbicides  
<http://www.iarc.fr/en/media-centre/iarcnews/pdf/MonographVolume112.pdf>

<sup>5</sup> Union of Concerned Scientists policy brief, December 2013 *The Rise of Superweeds – and What to Do About It*  
[http://www.ucsusa.org/sites/default/files/legacy/assets/documents/food\\_and\\_agriculture/rise-of-superweeds.pdf](http://www.ucsusa.org/sites/default/files/legacy/assets/documents/food_and_agriculture/rise-of-superweeds.pdf)

<sup>6</sup> Social Science Research Unit, Food Standards Agency, January 2013, Unit Report 17 *GM Labelling: Exploring public responses to the labelling of GM food and the use of GM-free labelling*. Summarised and linked from  
<http://www.food.gov.uk/science/research/ssres/foodsafetyss/gm-labelling/>

<sup>7</sup> GM Freeze briefing, June 2014 *Contamination Matters – Why GM crops can't be managed at a national level*,  
<http://www.gmfreeze.org/publications/briefings/170/>