

Food Information for Consumers Consultation Responses
Food Policy Unit
Department for Environment, Food and Rural Affairs
Area 7E Millbank, 17 Smith Square
London SW1P 3JR



By email to: labelling@defra.gsi.gov.uk

28 January 2013

Dear Sir/Madam,

Re: Consultation on implementations of the EU regulation on the provision of food information to consumers (1169/2011)

We are writing in response to the above consultation and in particular to request that Defra amends the implementing regulation to include a require labels on animal products produced using GM feed, which is currently not covered by the GMO Labelling and Traceability Regulations, and to permit animal products produced without using GM to be labelled as such.

Polls and research, included the work released by the FSA itself earlier this month, show that people want to know what is in their food and how it has been produced (see below for more detail). They understand that they need this information so that, if they wish, they can make an informed choice as to whether to purchase a give product or not. Such decisions may be based on a range of reasons, from ethical to food safety to nutritional quality, environmental impacts, animal welfare, ethical concerns, socio-economic or political concerns (including impacts on communities in producer countries), objection to how the GM feed is grown, monopoly control over seeds and the use of intellectual property rights to control access to seed, or a combination of all or some of these. Neither the GMO labelling and traceability regulations nor these proposals enable people to exercise that right to choose what they eat, GM Freeze thinks this is an excellent opportunity to make progress on that recognition that something needs to be done to enable the market to operate properly.

We welcome a number of provisions including:

- The fact that the Regulation applies to all stages of the supply chain, including mass catering outlets, and that they are designed to protect “health and interests” and avoid misleading information being presented to customers.
- The provision to ensure that suppliers pass on information to companies purchasing from them so that accuracy of labelling can be passed right down the chain.
- The requirement to label nanomaterials (Art18.3). Of course wholesome food can easily be produced without nanotechnology, so it is important that when manufacturers choose to use this technology it is clearly labelled. People may choose to avoid products containing or packaged using nanomaterials for reasons other than food safety – for instance they may be concerned about the impact of such particles on the environment, particularly through the waste stream.

However it has long been clear that these are not sufficient when it comes to consumer information about meat, milk and eggs from animals reared on GM feed. We therefore welcome any improvements in the level of information provided to consumers before they make purchases. Such information can send very strong messages to food producers and influence the way they operate their business, including the choices they make about production, ingredients and processing aids.

Previous arguments against such labels no longer hold, as they have been disproved by scientific

advancement, including:

1) There is now good evidence that fragments of GM DNA can survive the digestive process and pass into the blood stream of the animals consuming the GM feed. Indeed this is now acknowledged by the FSA:

“It is therefore possible that DNA fragments derived from GM plant materials may occasionally be detected in animal tissues, in the same way that DNA fragments derived from non-GM plant materials can be detected in these same tissues.”

(See www.food.gov.uk/policy-advice/gm/gmanimal)

Moreover EU-funded research has also detected genes, proteins and antibodies to GM proteins in blood of GM fed rats:

“There are also indications showing that genes from Bt (unique to Bt maize for example) can be found in the blood and also the proteins and antibodies against those proteins can be found in the blood of animal that have eaten this. That means there are components that can be transferred from the food/fed to the body and then maybe further onto to the next level that is eating this”.

(See Professor Åshild Krogdahl, GMSAFOOD partner from the Gut and Health Group of the Aquaculture Protein Centre at the Norwegian School of Veterinary Science, summarizing data at the GMSAFOOD Conference - GMO safety and post market monitoring, 6-8 March 2012, Vienna, Austria, available at www.youtube.com/watch?v=7nYiRJS-CZM)

Meat, dairy products and eggs clearly have the potential to contain GM materials, and are therefore different than products produced from non-GM feed. This is one good reason why there should be clear labelling on all GM fed products.

2) There is overwhelming consumer demand for such labels that goes back many years. Most recently qualitative and quantitative research carried out on behalf of the FSAⁱ found that two thirds of respondents support labelling of GM-fed animal products, and they strongly support the introduction of labelling indicating animal were not fed GM. Such non-GM-fed labels are already well established in Germany and France, where they enable people to exercise their choice to avoid GM for any of the reasons listed above.

We therefore believe that people have a very strong interest in knowing whether or not the animal product they are buying are produced with or without GM feed. It is entirely appropriate, if not long overdue, to amend the implementation Regulation of 1169/2011 to include this provision. This would enable those wishing to avoid GM produced products to finally have a comprehensive choice that has been denied them since 1996 when GM animal feed first was imported.

Finally all types of labelling should be clear and unambiguous and where possible to be on front of packs. If this means compromising the use of packaging to promote sales then we believe that this is preferable to keeping people in the dark about what they are purchasing.

I confirm that GM Freeze is happy for this response to be made public.

Yours faithfully,



Pete Riley
Campaign Director

ⁱ Food Standards Agency, 2013. [*GM Labelling: Exploring public responses to the labelling of GM food and the use of GM-free labelling.*](#) Qualitative and Quantitative Findings were based on research carried out by Define Research and Insight.