

Dr Sandy Lawrie  
Head of Novel Foods Unit  
Novel Foods Unit  
4C Aviation House  
125 Kingsway  
London  
WC2B 6NH



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

7th February 2011

Dear Dr Lawrie,

We are writing in response to your consultation on the application of the Novel Foods Regulations in relation to cloned pigs and cows and their descendents dated 13 January 2011.

GM freeze is opposed to cloning because it is a new and unproven technology with a number of serious problems associated with it including:

- High failure rates of cloning procedures.
- High death rates in cloned embryos and young animals.
- High rates of caesarean sections for surrogate dames.
- Poor life expectancy for clones.

In addition, the possibility of health impacts from consuming products from clones and their descendents have not been ruled out because there are too few data and there is an acknowledged need to investigate the epigenetic impacts in more detail.

EFSA's latest opinion<sup>i</sup> acknowledged the uncertainties arising from limited data:

***“Uncertainties in the risk assessment arise from the limited number of studies available, the small sample sizes investigated and the absence of a uniform approach to allow all the issues relevant to this opinion to be addressed.”***

The ACNFP acknowledged the need to study possible epigenetic effects on meat and milk, saying, *“Further evidence is required on how the rearing of animals in different environments may affect the meat and milk.”*<sup>ii</sup>

GM Freeze therefore believes that the suggested change in policy on the application of the Novel Food Regulations only to clones themselves, and not their descendents, is premature and unjustified. Products from clones themselves are unlikely to enter the food chain (at least in the short term). Given that cloned offspring are already present in the UK, and their products could enter the market in the near future, the decision not to regulate the products of descendents under the Novel Foods Regulations would effectively give cloning the go ahead in the UK without a means to regulate it or label products (as consumers overwhelmingly demand).

GM Freeze does not accept the FSA's argument in support of their revised position that:

*“One argument in favour of this interpretation is that it is impossible to determine, by examination or testing, which breeding practices were used to obtain an animal's ancestors, and there are no systems for the identification and traceability of farm animals that are produced by different breeding practices.”*

There are already several quality assurance schemes operating in the UK that rely on audited paper trails to ensure traceability and quality for customers rather than verification by direct testing. For instance, The Red Tractor Scheme, Fairtrade and Organic labels all deal with broadly-based methods of production for which no analytical test procedures exist. They all work, so it is hard to understand why the FSA is so fixated upon being able to test for clones and their offspring.

A test is not, in any case required, to operate a labelling system for clones and their offspring. In our view, all records relating to the cattle breeding and imports should be legally required to have a section dealing with any cloned ancestors in the breeding line. In livestock, such as pigs, where there is currently a lack of transparency about breeding lines, there is nothing to prevent the government introducing similar paperwork

and passports as are used for cattle and tagging of animals. An additional benefit of this would be from a biosecurity point of view, (given the role pigs and sheep had in spreading the foot and mouth virus in the 2001 epidemic) because it would enable animals to be traced between farms and markets.

The FSA's proposals also ignore the fact that there is a very strong argument for banning cloning completely on animal welfare grounds (which we set out above). However, Novel Food Regulations do not cover animal welfare matters. The European Union is currently looking at the regulation of cloning, and we will be pressing to ensure that this covers all aspects including health, welfare and possible environmental impacts of cloning in addition to ethics. It is therefore premature even to debate labelling until an overall decision on whether to allow cloning and the sale of products from clones and descendents is finally decided at EU level.

We share the view of the European Group on Ethics (EGE) in Science and New Technologies to the European Commission<sup>iii</sup> that:

*“Considering the current level of suffering and health problems of surrogate dams and animal clones, the Group has doubts as to whether cloning for food is justified...At present, the EGE does not see convincing arguments to justify the production of food from clones and their offspring.”*

GM Freeze believes that the FSA's current recommendation that the products of descendents of clones should not be assessed under the Novel Food Regulations evades the issue of how cloning should be regulated. We have no doubt that it should be until the EU decides whether or not there should be permanent ban.

The introduction of interim legislation to control the prevailing situation across the UK and ban products from clones and their offspring entering the market would make sound sense given that there:

- Are at least 96 offspring of clones already existing in the UK.
- Is deep public concerns about the practice of cloning.
- Is clear recognition in the FSA's consultation letter that the products of cloned offspring cannot exist without cloning taking place.

This would bring the situation under control and allow a reasoned debate to take place about the future of cloning, free from the distraction of cloned products entering the market.

Yours sincerely,



Pete Riley  
Campaign Director

---

<sup>i</sup> European Food Safety Agency, 2008. Scientific Opinion of the Scientific Committee Food Safety, Animal Health and Welfare and Environmental Impact of Animals<sup>1</sup> derived from Cloning by Somatic Cell Nucleus Transfer (SCNT) and their Offspring and Products Obtained from those Animals. (Question No EFSA-Q-2007-092) EFSA Journal 767 ;1-49.

<sup>ii</sup> Food Standards Agency 2010, Animal cloning for food production. Paper to Board 7 December 2010.

<sup>iii</sup> The European Group on Ethics in Science and New Technologies to the European Commission, 2008. Ethical aspects of animal cloning for food supply - Opinion No 23 [http://ec.europa.eu/european\\_group\\_ethics/publications/docs/opinion23\\_en.pdf](http://ec.europa.eu/european_group_ethics/publications/docs/opinion23_en.pdf)