

8 July 2008

Dear [National Ministers and experts attending the Standing Committee on the Food Chain and Animal Health]

Concerns: EU's 'zero tolerance' for unapproved GMOs under threat at upcoming Standing Committee

We are writing to you because we are very concerned that the EU may weaken GMO legislation set up to protect human health and the environment against potential negative effects.

The agro-chemical and animal feed industries claim that the EU's 'zero tolerance' policy towards contamination from unapproved GMOs should be relaxed because of fears that animal feed will become more difficult to source in the future. This would be a dangerous lowering of EU standards which would not solve the problems it is claimed to address, since it would not affect price and supply of food and feed. We therefore urge you to vote against any proposal to drop 'zero tolerance'.

At the next meeting of the Standing Committee on the Food Chain and Animal Health, due to be held on 14-15 July, this issue will be on the agenda. We understand the European Commission (DG Health) is drafting proposals on a 'technical solution' which would allow unauthorised GMOs into the EU food chain. As we will outline below, this move could have serious negative consequences for health and the environment and would not solve the problems the EU livestock industry is currently facing. More detailed information can be found in the attached briefing.

The false problem of 'asynchronous authorisations'

Those who want to weaken EU GMO law claim that there is a problem with the different timings of GMO authorisations ('asynchronous authorisations') between the EU and its main exporters. In reality such a difference exists between the US, which approves GMOs at an exceptional speed, and the rest of the world, where more cautious authorisation systems operate.

Over the past few weeks it has become even clearer that the 'zero tolerance' policy does not represent a problem for the EU. A report from DG Agriculture published last year¹ recognised that there was no problem continuing to source maize gluten for feed. With regard to soy, concerns have centred on the contamination risks linked to the new Monsanto Roundup Ready soy (RR2), which is planned for commercial cultivation in the US in 2009. However, RR2 will only be subject to imports to the EU from 2010 onwards. Moreover, the European Food Safety Authority validated the application to import RR2 in June 2007 and is now preparing its Opinion.

¹ "Economic Impact of Unapproved GMOs on EU feed imports and livestock production", DG Agriculture, June 2007

As regards Latin America, Monsanto has not yet applied for the authorisation of RR2 soy in Brazil or Argentina, both of which are much more significant producers for Europe than the US. Authorisations take on average 3 years in Argentina and 3 to 5 years in Brazil. Both countries are responsive to EU market demand and are unlikely to cultivate any GM crops not approved in their major export market. Therefore, the EU has more than enough time to find real solutions to ease the crisis in the livestock industry without any realistic threat of a major disruption to animal feed supplies through unauthorised GMO contamination.

Removing zero tolerance will not affect feed prices and availability

Causes of the feed price rises include the dependency of the EU on animal feed import, the abandonment of supply management instruments leading to the depletion of grain stocks, poor harvests in key producer countries such as Australia and speculation on the stock market. Another significant factor affecting farmers' costs is the rising price of oil which has affected fuel and fertiliser costs. Price increases have occurred around the world including in the US, which has the most permissive system of GMO approvals worldwide.

The European GM-free solution to stop dependency on feed imports

European farmers could easily grow the animal feed needed for European livestock, if the Common Agricultural Policy (CAP) health check and reforms will support policies to promote the cultivation of vegetal proteins and grassland grazing of cows/sheep, instead of supporting maize and imported soy, as is the case under current rules.

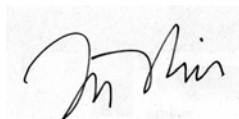
Concerns over DG Health proposals

We understand that DG Health is drafting a proposal on a 'technical solution' permitting unauthorised GMO contamination of 0.2-0.3%. Removing zero tolerance risks opening EU markets to foods contaminated with a host of unapproved GMO traits, including for example pharmaceutical crops. GMO crops at field trial stage have been shown to pose a risk, particularly following the 2006 US GMO rice contamination incident.

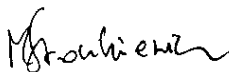
Sanctioning unauthorised contamination runs contrary to the principles of EU GMO laws, risks weakening global standards, and would not address the regulatory failures at the heart of GMO contamination incidents. Any attempt to water down EU GMO legislation will be highly controversial and unpopular with the European public.

Adopting via comitology 'technical solutions' that weaken EU legislation approved by co-decision is an unacceptable attempt to bypass the democratic process and would expose European citizens and their environment to unforeseeable and unacceptable risks.

Yours sincerely



Jorgo Riss
Director
Greenpeace European Unit



Magda Stoczkiewicz
Director
Friends of the Earth Europe



Gérard Choplin
European Coordination
Via Campesina