



**Friends of  
the Earth  
Europe**

HEINRICH  
BÖLL  
FOUNDATION

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## EU Member States responsible for coexistence

During its last session in Strasbourg the European Parliament adopted an amendment that lays the responsibility to ensure the coexistence between genetically modified (GM) and non GM crops in the hands of the EU Member States. The amendment inserts a new article 26a in Directive 2001/18/EC<sup>1</sup> which reads: "Member States may take appropriate measures to avoid the unintended presence of GMOs in other products." The Parliament also adopted a new recital (28a) to the new EC regulation on genetically modified food and feed that -among other things- specifies that "operators should avoid the unintended presence of GMOs in other products".

Although the new co-existence amendments have not yet officially become European law, there was already a broad agreement on the exact wording of the coexistence amendments between all relevant EU bodies (the Council of Ministers, the Parliament and the European Commission) before the EP vote took place. This means the dossier is closed and it is now just a matter of time before the new articles will enter into force. This is expected to happen before the end of 2003.

<sup>1</sup>The new article in Directive 2001/18 was inserted via a change in the EC Regulation on genetically modified food and feed.

Initially, a group of eight EU member states (see Biotech Mailout, May 2003) wanted the European Commission to present legislation on the EU level to ensure coexistence and to avoid the contamination of conventional and organic agriculture by GMOs.

This option was (and still is) also preferred by environmental NGOs, like Friends of the Earth. But the European Commission has stubbornly refused to take any legislative initiative with regard to coexistence, thus running the risk that conventional and organic food might get contaminated on a large scale by GMOs and that farmers and consumers right to choose for GMO free products will be undermined. Also the Commission has not foreseen any compensation for economic loss, that organic and traditional farmers could face when their products get contaminated by GMOs.

If the unintended presence of GMOs in a product exceeds the threshold of 0.9% established in European legislation, the product would have to be labelled as containing GMOs. According to the European Commission "This could cause a loss of income, due to a lower market price of the crop or difficulties in selling."<sup>2</sup> In other words: while acknowledging the threat of economic damage to organic and traditional farmers as a result of GM contamination, the Commission does nothing to prevent this threat.

Confronted by the Commissions refusal to protect European farmers and consumers, the EU member states have now reluctantly accepted that they are the ones responsible to avoid

contamination by GMOs and have supported the compromise reached between the Parliament and the Commission.

Although this compromise ("Member States may take measures to avoid the unintended presence of GMOs in other products") for the first time gives the Member States a legal basis to take measures against the unwanted spread of GMOs, it has many drawbacks:

- Member States are not obliged to take coexistence measures. Although originally there was a majority in the European Parliament that wanted stronger provisions in EU law (Member States "shall" take measures instead of "may"), the text was weakened after negotiations with the Commission.
- The new coexistence article could easily lead to different regimes in different EU member states. In the future this could have several negative consequences. Biotech companies could try to weaken standards by playing the Member States against each other. They could, for example, threaten to only invest in those countries where regulations are feeble. This may lead to a constant pressure (from farmers etc.) to minimize coexistence measures.
- The article adopted by the EP is not clear about who should carry the burden (including financial costs) of taking preventive measures to avoid genetic contamination. Since coexistence is expensive widely diverging regimes in the different EU member states can be expected. This will have clear repercussions for the internal market.

<sup>2</sup> Commission Recommendation on co-existence, published 23 July 2003 (C(2003) 2624)

- There is no specific liability regime in case organic and conventional farmers (or any other operator in the food chain) suffer losses when products get contaminated by GMOs. According to the European Commission the Member States should "examine existing civil liability laws" in order to find out if these national laws offer sufficient and equal possibilities in case of economic damage resulting from admixture. However, recently published legal advice<sup>3</sup> to the UK's Soil Association shows that under existing liability law it will be increasingly difficult for the affected non-GM farmer or non-GM operator to prove who caused the contamination. The more farmers that grow GM, the more difficult it will be to demonstrate from which field the contamination was blown in. Also the use of civil liability regimes will lead to legal cases of farmers against farmers, or neighbours against neighbours, which may cause unpleasant tensions in the countryside.

In spite of all these difficulties, several member states (Denmark, Austria) have already started initiatives to establish co-existence legislation. Also, in several EU member states there have been public statements by NGOs and/or Members of Parliament stressing the need and importance of legislation in this field. The most important initiatives so far can be found on the pages 8, 10 and 12 of this Biotech Mailout. It can be expected that more EU Member States will come up with initiatives in the next months.

Member States might also decide to coordinate national co-existence rules among each other (for example in the Council of Agricultural Ministers) in order to find joint solutions for the problems (e.g. the lack of an efficient liability regime, distortion of internal market) that have been left behind by the European Commission.

The urgency of coexistence legislation in Europe was again emphasized at the end of August, when Greenpeace and Friends of the Earth published a joint report on genetically modified maize in Spain, the only country in the EU where GM crops are -on a relatively small surface of 25.000 hectares- grown commercially. The report shows -among other things- that several organic farmers have already lost the organic certificate, which was withdrawn after the certifying body found GMOs in their products. The farmers suffered losses because their products could not be labelled organic anymore for marketing purposes. Due to a lack of adequate legislation, no compensation could be claimed (see page 11 of this Mailout for more details on the Spanish report).

The Spanish case illustrates what will happen on a much larger scale if GMOs would be released in European agriculture without adequate coexistence measures. Crops would get contaminated, farmers would suffer economic losses and consumer choice would soon be a word only to be found in history books.

<sup>3</sup> Legal advice by Charles Pugh, commissioned by the Soil Association.

It is therefore urgently needed that member states take all measures necessary to ensure that organic and traditional products are protected from being contaminated by GMOs. Friends of the Earth believes that in order to be effective, these measures should be taken along the following lines:

- Coexistence measures should be legally binding
- Seeds should remain GM free and thresholds for contamination should be effectively zero
- The costs of coexistence measures should be born by GM producers and GM operators
- A specific liability regime for GMOs should be established, taking away the burden of proof from non- GM farmers and non-GM operators in case of genetic contamination. This could for example be done via an industry-funded compensation fund
- Coexistence measures should be taken throughout the whole food chain: from farm to fork
- If measures at the farm level do not work, regional bans of GM crops and/or GMO free zones should be established

### European Commission's views on coexistence

On 23 July the European Commission presented a "Recommendation"<sup>1</sup> on the measures that EU member states could take to ensure the coexistence of genetically modified with conventional and organic farming. It is important to bear in mind that the Commission has chosen to leave the responsibility for solving the coexistence problem to the Member States. Therefore the Recommendation only has the status of advice from the Commission to the Member States and are not legally binding. The most important points in the Commissions Recommendation are:

- As a general principle, during the phase of introduction of a new production type in a region, operators (farmers) who introduce the new production type should bear the responsibility of implementing the farm management measures necessary to limit gene flow. (Recommendation, point 2.1.7) . This is a shift of policy compared to the Communication on coexistence that was launched by Commissioner Fischler in March 2003. In the Communication the burden of avoiding GM contamination was still on the producers that benefit from a specific form of cultivation., i.e. organic and traditional farmers. But if -as is proposed in the Recommendation- the burden of implementing measures would be on the farmer introducing a new production type, this would mean that GM farmers and operators would have to carry this burden. This is because currently in the EU hardly any commercial growing of GMOs takes place.
- National strategies and best practices for coexistence should refer to the legal labelling thresholds and to applicable purity standards for GM food, feed and seeds. According to the Commission these labelling thresholds would apply to conventional and organic farming alike.(Recommendation, point 2.2.3) This is a highly controversial point, since it means that organic farmers would have to give up high purity standards and allow genetic contamination in organic products. This could not only lead to ecological problems (such as lack of sufficient pure organic breeding material), but also to economic difficulties, since consumers might not be prepared to pay more for organic products when they have been contaminated by GMOs.
- Measures of regional dimension could be considered. (Recommendation, point 2.1.5) This opens the door for those Member States, provinces and regions throughout Europe that want to declare themselves a GM free zone. However, according to the Commission, such measures should apply only to specific crops whose cultivation would be incompatible with ensuring coexistence, and their geographical scale should be as limited as possible.

<sup>1</sup> Notified under document number C(2003) 2624

Cartagena Protocol:

# UN regulation on GMOs enters into force

The UN Cartagena Biosafety Protocol that regulates Genetically Modified Organisms (GMO's) on a global scale will become law on 11 September 2003. The Protocol adopted in January 2000 is the first global environmental agreement of the new millennium.

The Protocol seeks to protect biological diversity from the potential risks posed by living modified organisms (LMO's) resulting from biotechnology. It establishes an advance informed agreement (AIA) procedure to ensure that countries are provided with the information necessary to make informed decisions regarding the import of LMOs if destined to be release into the environment. For trans-boundary movements of GMOs destined to be used as food, feed or for processing the Protocol foresees an information exchange procedure administered by a Biosafety Clearinghouse which will be hosted by the secretariat of the Convention on Biological Diversity in Montreal.

## **GMOs are different**

The Cartagena Protocol is the first international agreement which clearly acknowledges that Genetically Modified Organisms (GMOs) are different from naturally occurring or traditionally bred organisms and therefore require a different treatment. The Biosafety Protocol backs the approach of the European Union, asserting that GMOs need different treatment from

non-GMOs. Therefore the Protocol stands in contradiction to policies held by some countries, such as the U.S., which are of the opinion that GMOs are not different from the conventional plants and animals they are derived from. But whereas the US is not a signatory to the Protocol, there is broad international support for the treaty. About two third of the signatories of the Protocol are developing countries (for more details on signatories and ratifications see the list of signatures and ratifications on the UN's website:

<http://www.biodiv.org/biosafety/signinglist.aspx?sts=rtf&ord=dt>)

The Protocol will require all exporters of GMOs destined to be released into the environment to take measures to prevent contamination of genetically modified GM seed products by implementing an identity preservation system, i.e. a system that makes it possible to identify seeds as being genetically modified throughout the production chain. The inclusion of the precautionary principle and the necessity for an advanced informed agreement for Living Modified Organisms (LMOs) intended for deliberate release into the environment, were some of the other important accomplishments.

The Protocol is a heavily negotiated agreement and consequently it is not as strong as would have been necessary to deliver full environmental protection.

Some of the weaknesses are the exclusion from the scope of the advance informed agreement procedure of LMOs destined to be used as food, feed or for processing, of pharmaceuticals containing LMOs and of LMOs destined to be used under contained conditions.

### **Cartagena Protocol sets minimum standards**

The Cartagena Protocol should be considered as the start of an international regulatory framework on GMO's., given the many issues that are still unresolved. One of the things still lacking is an effective liability mechanism under the Protocol to ensure that corporations that harm the environment, for instance through contamination by GM crops, pay for the pollution they create.

It is important to note that the Protocol only sets minimum standards and does not replace

national biosafety legislation. In fact, comprehensive biosafety legislation is urgently needed and should be put in place. According to article 2.4. of the Protocol enacting stricter national legislation on GMOs is allowed: "nothing in this Protocol shall be interpreted as restricting the right of a Party to take action that is more protective of the conservation and sustainable use of biological diversity than that called for in this Protocol, provided that such action is consistent with the objectives and the provisions of this Protocol and is in accordance with that Party's other obligations under international law".

In the European Union a EU regulation implementing the Cartagena Protocol, that on certain aspects is stricter than the Protocol itself, has already been agreed (see article on page below). At the same time it is worrisome that most developing countries are lacking the capacity to implement the Protocol.

## **EU agrees stricter export rules for GMOs**

In June the European Parliament adopted in second reading a compromise reached with the Council of EU ministers on the implementation in the EU of the UN's Cartagena Protocol regulating GMOs. (EU Regulation COM (2002) 85). The agreement reached by the Parliament and the Council implies that the export rules will be stricter than the European Commission originally proposed. The Cartagena Protocol sets out minimum standards to protect biodiversity against the potential risks of GMO's (see also the article on page 5 of this Mailout). As import

of GMO's is already covered by other EU legislation, the new Regulation will only cover export of GMOs from the EU to third countries. Although the new Regulation so far has not received extensive public attention, the Wall Street Journal has recognized the importance of the new legislation: "Under the revised rules, no such organisms can be exported (i.e. GMOs) from Europe without the "formal" consent of importing countries. That can raise barriers to exports as developing countries increasingly balk at new technologies."

Some important aspects of the new Regulation include:

- **Written consent for export of GMOs will be required.** No first transboundary movement of a GMOs destined to be released into the environment may take place without prior written, express consent of the importing country. The Commission's proposal did not require prior written consent.
- **GMOs not authorised in the EU shall not be exported to third countries.** GMOs for feed or food use should not be exported if not authorised for those purposes under Community law. There is, however, in line with general EU food law, an exception to this principle: GM food or feed not authorised under community law may be exported if explicitly requested by the importing country and if the importing country has been informed about the fact that the GMO is not authorised under Community law.
- **Unintentional transboundary movements have to be avoided.** Council and Parliament agreed against the vote of the Commission that "Member States shall take appropriate measures to prevent unintentional transboundary movements of GMOs." The definition of "transboundary movement" ("intentional or unintentional movement of a

GMO between one Party or non-Party and another Party or non-Party, excluding intentional movements between Parties within the Community") means that EU Member States also have to prevent unintentional transboundary movements to other Member States which certainly is an interesting and new aspect in the debate on co-existence.

- **Exporter is responsible for notification and accuracy of information.** Under the so-called advance informed agreement procedure contracting parties of the Biosafety Protocol have to ensure that exports of GMOs destined to be released into the environment are notified and informed in advance. While the Protocol identified the exporter as being responsible for the notification, the Commission had proposed proposed that also importers could make a notificatoin. But the Commissions proposal was not taken over by the Parliament and the Council and the Regulation as adopted makes it very clear that it is the exporter who has to notify the country of import and it is also the exporter who is responsible for the accuracy of the information.
- **Access to information will be granted.** In accordance with the Community rules on access to environmental information, export notifications are accessible.

Coexistence in Italy:

# MPs take action against genetic contamination

Italian and European members of Parliament call on the President of the Commission Romano Prodi to ensure the preservation of Italian food

## *Italian food is an asset for Italy and for Europe*

Dear President Prodi,

Recent initiatives and political events foresee that the EU moratorium on the introduction of new genetically modified organisms in agriculture is fast approaching its end. Crucial decisions will be taken, which concern the European food systems developed over centuries.

We, as elected members of both the national Italian Parliament and the European Parliament, are particularly concerned about the consequences that such decisions will have for agriculture and food production as well as for farmer and consumer practice in our country.

Italian agriculture and food production is unique, strongly interlinked with the territorial and cultural context of the country's regions. Italian products are regarded as of high quality around the world. The different quality labels such as PDO (Protected Designation of Origin), TSG (Traditional Speciality Guaranteed) and the organic label have been taking off rapidly and that is a winning card Italy can successfully play in the global market opposing the homogenisation of taste.

The high quality of Italian food derives from the uniqueness of the production practice. Italian agriculture has developed in a territory with strong climatic and morphologic characteristics: The environment, dominated by mountains and hills, has considerable impact on agriculture, farms are generally small, and there is extensive interaction between cultivated areas, protected areas and woodlands. This relationship between nature and human activity has shaped a unique rural landscape.

Co-existence between genetically modified crops, conventional and organic farms in such a geographical and historical reality is something impossible to imagine. The measures that the European Commission proposes, in order to ensure segregation and avoid GM contamination would have an untenable cost for the agricultural and food systems and would jeopardise the continuation of quality labels as well as endanger biodiversity, an added value of Italian agriculture. With the coming into force of the new EU rules on labelling, farmers and food suppliers would encounter serious credibility problems in both the domestic and international markets. Consumers' doubts and uncertainty will eventually jeopardise the survival of typical Italian products, both organic and conventionally produced.

For the above reasons and considering that there is no scientific evidence that GMOs are harmless to human health and the environment in the long term, we ask you to promote the following initiatives that we deem indispensable in order to protect the uniqueness of Italian food:

- To uphold the moratorium on authorisation of new genetically modified organisms until the final approval of EU legislation on labelling, traceability and the adoption of strict rules on liability.
- To maintain tolerance levels no higher than the analytical zero for accidental seed contamination, in order to ensure a real separation between GM and GM-free cultivation. This is a technically feasible choice, as demonstrated by hundreds of producers that in different parts of the world are able to certify the purity of their products. Any different choice in the strategic seeds sector would determine uncontrollable subsequent contamination.
- To acknowledge the uniqueness of those agricultural and environmental systems that are founded upon quality promotion, traditional and typical foods and the protection of agro-biodiversity and to establish that the related areas are to remain perpetually GM free. Obviously, in accordance with the polluter pays principle, the costs to implement the measures necessary to prevent contamination cannot burden conventional and organic farmers.
- To support the launching of an important research programme on the future of European agriculture and on food security and safety, starting with a detailed analysis of the economic, health and environmental implications of biotechnologies and of their innovation potential. The programme would grant the public sector an autonomous evaluation capacity, a capacity that presently does not compete with the effort that the big biotech companies put into the promotion of their patented products.
- Reaffirm and maintain the precautionary principle approach in the context of the WTO agricultural negotiation.

**Published in July 2003. Signed by a cross party coalition (including the Greens, Forza Italia, Christian democrats and Alleanza Nazionale) of more than 200 Italian Members of Parliament and by 28 Italian members of the European Parliament.**

## Co-existence in Austria:

# The fight for GM free zones

In Austria 5 provincial parliaments (Burgenland, Salzburg, Styria, Carinthia, Upper Austria) demanded their governments in 2002 to declare their province a GMO-free Region. The first province to take action was Upper Austria. The Upper Austria's provincial parliament passed a Gentechnology Prohibition law in January 2003. In the law Upper Austria takes a precautionary stance and argues that as long the coexistence problem is not solved, the cultivation of GMOs has to be banned for a period of three years.

On 2 September 2003 the European Commission rejected the Upper Austrian measures. But the case is not lost forever. Upper Austria had based its decision on Article 95 (5) of the EC Treaty and this legal ground was rejected by the Commission. But by using other approaches the province might still put restrictions on GM cultivation in place in order to protect the environment plus traditional and organic agriculture against the risks of GMOs. The two most obvious possibilities are:

- Restrict the growing of specific GM crops on the basis of the new co existence article in Directive 2001/18/EC that was adopted by the European Parliament in July (see article on frontpage of this Biotech Mailout). Although the article does probably not justify a blanket ban, it could be used to restrict the cultivation of specific GMOs. Also the European Commission has already indicated that individual crops could be banned in a region on the basis of co-existence considerations. In a recommendation on co-existence published on 23 July, the Commission writes that:

"Measures of a regional dimension could be considered. (...) They will need to be justified for each crop and product type (e.g. seed versus crop production)". Interestingly enough Agricultural Commissioner Fischler -in an interview with Dow Jones International News- has already cited Austria as one of the countries where bans on specific crops could be necessary to ensure coexistence.

- Under Article 19 of Directive 2001/18/EC particular geographical areas or habitats/ecological zones can be excluded from GM marketing consents, through legal conditions, on a case by case basis provided the environmental case can be made to support each application.

It is very unlikely that Upper Austria will remain the only province in Austria to take action to safeguard GM free agriculture. Carinthia for example has already submitted a " Gene Technology - Precautionary law". According to this legislative proposal farmers who want to grow GMOs are obliged to prove that they meet all requirements to avoid GMO contamination to adjacent fields. This law was sent out for review to the EU in the beginning of June. It is foreseen that it will enter into force in the autumn of 2003.

Furthermore in June the presidents of farmers association from Carinthia, Styria, Slovenia, Friaul-Julisch Ventia and Veneto signed an agreement to form a GMO-free Bioregion. There is also an initiative for a GMO-province by Tirol and Vienna, so that almost every province in Austria has now indicated that it wants to go GMO-free.

## GM crops in Spain:

# Failing in the field

A recent study published by Friends of the Earth and Greenpeace demonstrates that the growing of GM crops in Spain is causing contamination of organic crops, producing low yields and its benefits are grossly overstated. The report is also highly critical of the Spanish Government for failing to properly control or monitor the situation. [1]

Spain is the only country in the European Union where GM crops are grown at a commercial scale: since 1998, an estimated 25,000 hectares are planted each year with a genetically modified corn variety (called Bt176) sold by the Swiss biotech company Syngenta. The corn has been engineered to resist the European Corn Borer, a potentially harmful insect for maize. The cultivation of GM corn in Spain is taking place without any official evaluation (although prescribed by Spanish law). However, there is now information - made available through a few independent studies - that shows that the GM plantings pose serious economic and environmental problems:

- A study by IGTA [2] demonstrates that - over the years 1998 to 2000 - in most cases there were no differences between conventional and GM crops when attacked by the corn borer. This indicates that the corn borer survives the toxin produced by the GM plant, which poses a real risk if resistance develops. This can not only create an economic problem to farmers, but also an environmental problem, since heavier and more

environmentally damaging pesticides will be needed to fight the "armed" insects.

- The first cases of organic crops contaminated by GMOs have been discovered in the northern region of Navarra by the Council of Organic Farming in Navarra (CPAEN, a public organic certifying body). Consequently the organic certificate was withdrawn and farmers suffered losses because their product could not be labelled organic anymore for marketing purposes.
- Studies have shown that the yields for the GM crop are substantially lower than comparable conventional varieties. For example, one study reported that in 1999 the GM corn yielded 25% less than the top yielding variety.
- The Spanish Government's own Working Group on Pesticides reported in 2002 that corn borer incidence in Spain is "low" and "does not justify the use of these GM varieties" [3]. In contrast, the biotech industry states that "Spanish farmers have suffered European Corn Borer for generations". [4]

### notes

1. The report "The impact of GM corn in Spain" is available from Friends of the Earth and Greenpeace websites in Spanish and English: [www.tierra.org](http://www.tierra.org) and [www.greenpeace.org/espana\\_es](http://www.greenpeace.org/espana_es)
2. Instituto Técnico de Gestión Agraria del Gobierno Navarra, the Official Farm Research Institution in Navarra
3. Spanish Ministry of Agriculture- Report of the Working Group on Pests and Diseases in Extensive Crops. April 2002.
4. Europabio press release, 27th September 2002.

# Danish Parliament to decide on coexistence

Denmark is likely to be one of the first countries in the EU to implement legislation to ensure the co-existence between genetically modified (GM) and non-GM crops. On 30 June a strategy paper on co-existence was presented by the Ministry of Food, Agriculture and Fisheries<sup>1</sup>. This strategy paper will be debated in the Danish parliament this autumn. On the basis of the outcome of that debate the Ministry will present a law on co-existence to the parliament. It is foreseen that this will happen in February 2004.

## Measures to ensure co-existence

In the Danish proposal the responsibility to avoid GM contamination and to ensure co-existence is laid in the hands of GM growers. The demands made on them relate to farmlevel measures such as mandatory separation distances, cleaning of machinery and a mandatory course on how to handle GMOs. Furthermore, GM rapeseed, grass and clover may be banned since co-existence for these crops seems impossible. To ensure co-existence it will be necessary to pay attention to the full chain of production and distribution. Therefore, measures at transport and retail level are included in the proposal.

## Who is going to pay?

Concerning the financial aspects of co-existence, Kent Harnisch from the Ministry of Food, Agriculture and Fisheries told the Biotech Mailout that GM operators will have to pay the costs of the implementation of necessary co-existence measures. According to Harnisch, this position is supported by a majority in the Danish Parliament<sup>2</sup>.

## Liability

The Danish Ministry proposes that GM farmers that don't comply with the rules set out in the co-existence legislation, will be liable under existing Danish civil law. However, in many cases it would probably be difficult to prove which farmer caused genetic contamination and thus to establish who is liable. (see also the article on page 1 of this Mailout). Therefore the Danes propose to set up a compensation fund for organic and traditional farmers suffering an economic loss due to the growing of GM crops. This funds could be used in those cases where liability cannot be established. The compensation funds is to be filled by public money, such as government subsidies.

<sup>1</sup> Find the press release in Danish Ministry webpage: [http://www.fvm.dk/nyheder\\_presse.asp?artikelid=2407&page\\_id=243](http://www.fvm.dk/nyheder_presse.asp?artikelid=2407&page_id=243)

<sup>2</sup> For more information on the costs of co-existence see "Co-existence is expensive: Danish study shows extra costs as high as 21%", FoEE Biotech Mailout. Volume 9, Issue 1. February 2003

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