

FoEE Biotech Mailout

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NEW MOVES TO END THE EU MORATORIUM ON GMOs

The EU's moratorium on commercial approvals of genetically modified organisms (GMOs) is under threat. Since the 22nd January 2003, the European Commission has published 18 notifications for placing on the market of new GMOs (see: http://gmoinfo.jrc.it/partc_browse.asp). Some of the applications submitted so far are obviously 'old' applications which Member States received years ago, some as far back as 1996. Many of the notifications also appear to be so-called 'complemented applications', i.e. old applications for placing on the market which have been 'complemented' (i.e. updated) in order to comply with the new deliberate release Directive 2001/18/EC. According to Article 35.2 of Directive 2001/18/EC, applications submitted under the old Directive 90/220/EEC but still pending as of 17th October 2002 could be 'complemented' by 17th January 2003. This partly explains the reason for the sudden increase in the number of notifications, although others are new notifications which did not appear on the pending list before, e.g. Monsanto's insect-resistant maize MON863 x MON 810 notified via Germany, Monsanto's herbicide-tolerant maize notified via the UK, as well as Bayer's herbicide-tolerant soya beans and Monsanto's Roundup Ready sugar beet both notified via Belgium.

While more than half of the 18 notifications concern the import of GMOs for food and feed processing within the Community, there are several notifications which seek authorisation for the commercial cultivation of GM crops such as oilseed rape, sugar beet, cotton and potatoes. The applications have been made by just a few multinational biotech companies, mainly Monsanto : 10 applications, and Bayer (which took over Aventis) : 5 applications.

Countries that have forwarded notifications for consideration by the Commission and other EU Member States include Sweden, Belgium, Germany, the Netherlands, Spain and the UK. On the one hand, this relatively large number of countries seemingly indicates that there is growing support to end the moratorium. On the other hand, however, it is worth noting that the countries that have so far enforced the moratorium - Austria, Denmark, France, Greece, Italy and Luxembourg - have not forwarded any notifications to the Commission. Together these countries have enough votes under the EU's Qualified Majority decision-making procedure to form a blocking minority which could uphold the moratorium and effectively prevent any new approvals.

The "moratorium countries" have good reasons to do so. Many problems relating to GMOs have not yet been resolved. It therefore makes sense to keep the moratorium in place at least until:



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- consumer choice is protected and guaranteed at such time that full labelling and traceability rules are in place;
- specific liability legislation making biotech companies legally responsible for any future unpredicted problems is adopted;
- future seed production is protected from contamination;
- the protection of organic and conventional farms from GM contamination is legally binding.

While some of these problems are currently being addressed by EU decision-makers, legislation is not yet finalised in any of these areas. It is expected that new rules for labelling and traceability of GMOs will not be adopted before autumn of 2003. Liability legislation, on the other hand, is only at an early stage and needs to be significantly improved, especially with regard to GMOs. As far as the protection of conventional and organic farms against GM contamination is concerned, no legislative initiatives have yet been taken at EU level, although this is urgently required in light of problems of so-called "co-existence" of genetically modified crops with conventional and organic crops (see also the article on page 5 of this Mailout).

Tabling objections is still possible

The EU member states are entitled to ask for further information, make comments or present reasoned objections to the GMO notifications. This should be done within 60 days from the date of circulation of the assessment report. The deadline for the Member States to make comments to the first three notifications - Monsanto's Roundup Ready

herbicide-tolerant oilseed rape and two types of Monsanto herbicide-tolerant maize - is 22 March. The deadlines for Member States to comment on the 15 other applications are in April. As far as the public is concerned, it is no longer possible to file objections to the first three applications, but objections from the public to the remaining 15 applications is still possible (comments can be sent to http://gmoinfo.jrc.it/partc_browse.asp where the relevant deadlines and the dossiers of each notification are

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available).

Any objections raised and maintained by one or more EU Member State will inevitably cause a change in and delay of the authorisation procedure. Instead of the "standard procedure" (105 days), the "community procedure in case of objections" (120 days) will apply. In the latter case, a formal decision has to be taken either at the level of the competent Regulatory Committee or the Council. The procedure according to the Directive works as follows:

- If the draft decision proposed by the Commission is not in accordance with the opinion of the Committee, or if no opinion is delivered (e.g. because the opinion does not receive the required qualified

majority), the Commission must, without delay, submit its draft decision to the Council (and inform the European Parliament).

- The Council may then adopt the proposed decision by qualified majority within three months from the date of referral to the Council.
- If within that period the Council indicates by qualified majority that it opposes the proposed decision, the Commission shall re-examine it. The Commission may submit an amended proposal to the Council, re-submit its proposal or present a legislative proposal on the basis of the Treaty.
- If on the expiry of the three months the Council has neither adopted the proposed decision nor indicated its opposition to the Commission's proposal, the proposed decision is adopted by the Commission.

It is important to note that - although the Council is, in principle, under an obligation to adopt a position within three months - the period of time that the Council takes to deal with the proposed decision is not taken into account for the purpose of calculating the 120 day period. This means that if at least one Member State raises objections, instead of the stipulated 105 days (under the standard procedure) the procedure may take 120 days + 120 days for comitology, or even longer if the Council rejects the proposed decision by qualified majority and the Commission decides to revise and re-submit its draft decision.

In order to reject a proposed decision, the Council needs a qualified majority. The situation may well be that there is neither a qualified majority against nor a qualified majority in favour of the Commission's proposed decision. In that case the decision, as proposed by the

Commission, would be adopted. The countries supporting the moratorium may block a qualified majority but do not have enough votes between them to form a qualified majority (which requires 71% or 62 of the total 87 votes held by the 15 Member States). This is based on the assumption that Austria (4 votes), Denmark (3), France (10), Greece (5), Italy (10) and Luxembourg (2) still all uphold the moratorium. However, in a Declaration on the Council Decision 1999/468/EC of 28 June 1999, the Council committed itself with regard to decisions in "particularly sensitive sectors" to "act in such a way as to avoid going against any predominant position which might emerge within the Council against the appropriateness" of a proposed decision.

First application: incomplete and inconsistent

Friends of the Earth Europe (FoEE) has analysed in detail the first of the 18 notifications: an application by Monsanto for the marketing of genetically modified GT73 oilseed rape. Because the notification was first made in 1998 (under the old Directive 90/220) and the new Directive 2001/18 entered into force in the meantime, FoEE paid special attention to compliance with the new law. FoEE also tried to find out if Monsanto has delivered all relevant studies relating to environmental risks and food/feed safety to the EU. This was not an easy task since most of the dossier was not available for the public. In the case of GT73 oilseed rape, the website of the Joint Research Centre (where the Commission publishes the notifications and risk assessments), only provides a 12-page summary of the evaluation of the notification carried out by the Netherlands Competent Authority. In addition, there is the summary notification information format (SNIF)

“An interesting “detail” is that the two studies that Monsanto did not deliver to the EU show less favourable results “

of 20 pages. It is not indicated either on the JRC website or in any other form by the European Commission or the Member State Competent Authority if and where the full documentation can be accessed.

This means that out of a dossier of supposedly 5000 pages, only 32 pages are publicly available which, needless to say, makes a mockery out of the EU's policy for more transparency.

Nevertheless, on the basis of the summaries published by the Commission and information available on several web sites, several conclusions can be drawn about Monsanto's application for the commercialisation of GT73 oilseed rape in the EU, such as:

- Monsanto has not delivered all the studies that it conducted with regard to feed safety of GT73. The feed safety assessment presented by Monsanto in the additional information is supported by a four-week feeding trial on rats (Naylor MW, 1996). It should be noted that this study submitted to the EU is, in fact, only one of three such studies conducted by Monsanto, as can be concluded from a description of all three studies on the web site of the US Food and Drug Administration (FDA). An interest-

ing “detail” is that the two studies that Monsanto did not deliver to the EU show less favourable results (like significant decrease in body-weight in rats that were used during feeding trials).

- Monsanto has failed to give an explanation for the consistently higher level of alkyl glycosinolate (an anti-nutritional factor) in the GM oilseed rape.
- The guidelines with regard to environmental risk assessment that are part of Directive 2001/18 have not been followed. This means the risk that the GM oilseed rape may pose to the environment have not been properly assessed.
- The monitoring obligations which are laid down have been neglected. No measures are given for the management of an accidental release of GMO oilseed rape into the environment and no monitoring plan is proposed in order to detect such an accidental release.

Friends of the Earth believes that these four facts alone should be more than enough for EU Member States to object to Monsanto's application or to at least ask for additional information (like the missing feeding studies). FoEE also believes that the Member States should carefully scrutinise all other applications, especially the ones delivered by Monsanto: a company that has repeatedly demonstrated itself to be the 'champion' when it comes to delivering horrifyingly bad information about the health and environmental impacts of GMOs.

For FoE's full assessment of Monsanto's oilseed rape application, visit the GMO pages on <http://www.foeeurope.org/GMOs/Moratorium.htm>

US THREATENS WTO CHALLENGE

Just a war of words ?

On several occasions since the existence of the EU's 'de facto' moratorium on GMO approvals (no authorisations have been granted since 1998) the US administration has threatened to file a complaint under the World Trade Organisation (WTO) to force Europe to open its markets to American exports of GM crops. Many officials in the Bush administration favour a WTO challenge to the EU, and they are supported if not coerced into such action by the strong industrial farming lobby in the US which has seen its maize exports decline by a reported \$300 million per annum as a result of third countries' opposition to GM crops.

Who's calling who "immoral" ?

The beginning of the new year saw the WTO/GMO row between Washington and Brussels reach new heights - and indeed plummet to new depths - with accusations and insults being traded between US and EU officials via press articles and in public fora such as the letters column of the Wall Street Journal. What seems to have spurned US Trade Representative Robert Zoellick into even more hot-blooded criticism than usual of Europe's stand on GMOs is the African situation, i.e. the fact that some African countries whose populations face severe food shortages have chosen to either impose certain conditions on US food aid (e.g. compulsory milling of GM maize), or even decline it altogether. Mr. Zoellick apparently considers that the position of those African countries, apart from leading to the possible closure of future lucrative Africa markets for

GM crop exports, stems from an "immoral" attitude on the part of Europeans as regards GMOs and the Africa's food crisis.

While EU officials had more or less

“Many officials in the Bush administration favour a WTO challenge to the EU, and they are supported if not coerced into such action by the strong industrial farming lobby in the US “

been keeping their heads down during the first half of January amid media reports of an impending WTO challenge, the "immorality" accusation (taken up by an article in the Wall Street Journal) proved too much and provoked a hard-hitting letter from six EU Commissioners published in the WSJ on 21.01.2003:

"To say Europe is "bullying Africa into refusing to accept American food aid even though millions are malnourished and starving" is downright irresponsible. The EU has never suggested to African governments that GM foods are unsafe Neither has it said that GM should not be allowed into their countries. Neither Europe nor even the U.S. has the right to tell sovereign African nations what kind of food aid they should accept or not accept. Moreover, choices for developing countries should not be limited to "accept GM food aid or starve". The EU's own policy is to source food aid regionally, thus ensuring that the countries in need receive the food-stuffs to which they are accustomed as

well as helping local economies. Food aid to Southern Africa should be about meeting the urgent humanitarian needs of those who are starving. It should not be about trying to advance the case for GM food, or planting GM crops for export, or finding outlets for domestic surplus. This in turn is immoral."

Choose which report you want to quote from

The EU Commissioners' letter in turn provoked a heated response from US Trade Representative Zoellick (WSJ 24.01.2003) who chose to single out December 2002 reports from the French Academies of Medicine and Pharmacy which stated that no health problems had so far been identified with GM foods and that GMO authorisations should be re-started. He failed to mention, however, that the reports specified a "considered and cautious" and "case-by-case" approach to the introduction of GM plants, or that other institutions such as the French Food Safety Agency (AFSSA) have recommended much more testing to evaluate the long-term risks of GM food (see *Biotech Mailout* Volume 8, Issue 1, 1.02.2002). Indeed, Mr. Zoellick seems to ignore relevant reports published in his own backyard, for example the very recent study by the US Center for Science in the Public Interest entitled "Holes in the Biotech Safety Net" which pinpoints short-comings of the FDA approval system for GMOs (see *separate article on page 7 of this Mailout*).

Bad PR

One assumes that while this war of words was going on, some pretty

heavy diplomacy being brought to bear behind the scenes to cool the escalating hostility between the EU and the US. With the European Union currently at odds over a possible war in the middle east, and a lot of public animosity in Europe towards the Bush administration's stance on Iraq, now is not the time that the US needs to make more enemies.

“ Food aid to Southern Africa should be about meeting the urgent humanitarian needs of those who are starving. It should not be about trying to advance the case for GM food “

Quite apart from the political situation, whichever company is currently public relations advisor to the biotech industry (and the White House) must realise that taking an even more heavy-handed line on GM crops and filing a complaint against the EU under the WTO could just fan the fire of GMO-resistance in Europe even more. The US might literally be shooting itself in the foot by doing that - a fact pointed out by EU Consumer Affairs Commissioner David Byrne: "If consumers see that something is done to force a situation which they do not want, I think the effects would be adverse" (*Reuters*, 28.01.2003). One assumes that the powers-that-be in Washington have finally realised that, since by early February the WTO threat had once again receded into the background.

CO-EXISTENCE IS EXPENSIVE

Danish study shows extra costs as high as 21%

During a hearing in the Danish Parliament in January this year, a group of Danish experts presented a report on the co-existence of genetically modified (GM) crops with conventional and organic crops. The report is called (in English translation) "Report from the Working Group on the co-existence of genetically modified crops with conventional and organic crops" and was requested by the Danish Minister of Agriculture, Mariann Fisher Boel. The group of Danish researchers evaluated the possibilities for several types of GM crops to be grown alongside organic and conventional crops in Denmark. The analyses, largely based on smaller model experiments and on simulated computer models, includes three scenarios for each crop:

- a 0% scenario: No GM varieties of this crop or GM crops with which it can cross-pollinate are grown in Denmark or in a region;
- a 10% scenario: There is moderate growing of the GM crop;
- a 50% scenario: There is large scale commercial growing of GM crops.

An important assumption which the researchers made is that the threshold value for the presence of GMOs in conventional crops should be no higher than 0.9%. This value is based on the political agreement reached in November 2002 in the EU Council of Ministers for threshold values for GMOs of 0.9%. If GMOs are "adventitiously" present in food or feed below this threshold, labelling as

GM will not be required. The assumption of a 0.9% threshold by the Danish experts is rather controversial since the threshold that was agreed by the Ministers is a threshold for "adventitious" presence and should not be taken as a standard value up to which GMO contamination is allowed. The 0.9% threshold will only be applicable if an operator can show that the presence was unintentional and can demonstrate that he took appropriate measures to prevent GM contamination. Moreover, the final decision with regard to a threshold for GMOs has not yet even been made, since the European Parliament still has to vote in second and third reading and previously voted for a 0.5% threshold in first reading.

It could therefore be argued that the choice of a 0.9% threshold is rather premature and arbitrary. The researchers could also have logically chosen 0.5%, based on the Parliament's position. This would probably have resulted in even more restrictive possibilities for the co-existence of GM crops with conventional and organic crops in one country or region. On the other hand, the researchers have occasionally - for some crops in certain scenarios - also used a 0.1% threshold for organic crops.

Limiting gene transfer

Despite the fact that the assumptions on which the study is based can be criticised, the Danish report produced some interesting results. The group of researchers states that whichever crop is grown, be it conventional, organic or genetically modified, genes will always to some extent be transmitted to other crops of the same species. According to them, the extent of transmission depends on factors such as:

- crop characteristics including choice of variety;
- the size of the area grown with the crop and inter-field distances;
- existence of wild relatives;
- human handling;
- wind conditions;
- pollinating insects.

The most important routes of transmission identified by the group are via seed, pollen, straw, volunteer seed left in the soil, sowing and harvesting machines, transport equipment and storage facilities. However, the researchers state that various crop-dependent safeguard measures can be adopted, among which the most important are:

- control of seeds;
- separation distances and buffer zones;
- cropping intervals (years between crops);
- control of volunteers and possible wild relatives;
- cleaning of sowing, harvesting and transport equipment as well as storage areas, and the control of use of straw.

It can be expected that it would be very complex to implement those measures and, since existing knowledge in this area is limited, the researchers point out that there are varying degrees of uncertainty associated with their assessments and evaluations. Nevertheless, the researchers have drawn some conclusions about the feasibility of co-existence in Denmark which, given the aforementioned uncertainty, should be treated with some caution. According to the report, with limited GM-production in Denmark, co-existence with conventional crops of maize, beet, potatoes, barley, wheat, oats, triticale, rye, lupin, broad beans and peas is possible at the proposed threshold values as long as the suggested measures are adopted. However, in the case of crops such as oil-seed rape, grass seeds, clover seed

and vegetable seed, the problem of co-existence is so extensive that no conclusions can be reached and further evaluation is needed. In order to ensure a GM-content in organic crops of close to zero (detection level ~ 0.1%) further measures will become necessary. The most important measure that the researchers mention is to ensure a high degree of seed purity. This recommendation further consolidates the argument against the European Commission's proposal to allow GMOs up to a threshold of 0.3% - 0.7 % in seeds. This proposal is currently being discussed by the EU's Standing Committee on Agricultural, Horticultural and Forestry Seeds and Plants and, if adopted, would make organic production impossible, as is again confirmed by the Danish report.

The costs of co-existence ...

Another important section of the Danish report concerns the costs of co-existence. These costs result from implementing the measures that should ensure that GM contamination of conventional and organic crops stays below the assumed thresholds. The researchers estimate that the extra costs are at:

- 0-2 % for conventional/organic maize, potatoes and cereals;
- 3-9% for conventional rape, beet, grass and vegetables;
- 8-21% for organic rape, beet, grass and vegetables.

It should be noted that these extra costs only include costs for the primary production and not for measures (like segregation and labelling) that need to be taken further on in the food chain, for example by the animal feed industry, the food processing industry and retailers.

... and who pays?

One can therefore safely conclude that GM agriculture is expensive. However, the key question "who is going to pay for these extra costs?" has not yet been answered. The researchers do not make any recommendations as to who

should cover the expenses connected with measures to prevent GM contamination, such as crop segregation, buffer zones, cleaning of equipment, etc. Likewise, they do not make any recommendations on who should cover the extra expenses incurred if GMOs are found. Nor do they make any recommendations on who should pay the extra expenses in connection with monitoring and control.

It is not surprising that the researchers fail to address those questions since this a highly controversial area that has not yet been addressed by the responsible politicians. Until now, neither the European Commission nor the EU Member States have given any answers to the key question of who is going to pay the extra costs involved if GM agriculture is introduced on a large scale in Europe. Friends of the Earth believes these problems should be resolved and that clear legislation on the issue of co-existence should be adopted before there is any further discussion on lifting the EU moratorium on GMO approvals. If new commercial releases of GMOs are allowed before the key question of who is responsible for the extra costs is resolved, huge uncertainty for farmers, the food industry, retailers and consumers will be created. Furthermore Friends of the Earth believes that - as a matter of principle - all extra costs should be borne by the companies who possess the patents on GMOs. The fact that they want to introduce these new crops in the EU (in the hope of making huge profits) is responsible for creating these extra costs. It would therefore be totally unjustified if other parties, such as consumers, retailers and (organic) farmers, would have to pay extra costs caused by products which they never asked for and do not want.

The full text of the Danish report (in Danish) is available on: http://www.fvm.dk/high_final.asp?page_id=455
An English summary is also available.

HOLES IN THE BIOTECH SAFETY NET

US report slams FDA procedures

A recently published report by the Center for Science in the Public Interest (CSPI) has severely criticised the US authorisation procedure for GMOs approved for use as food and feed. The CSPI found that the US Food and Drug Administration (FDA), which is responsible for the safety of both food and animal feed, "performs a less than thorough safety analysis". The FDA's voluntary notification process (even if made mandatory) is not up to the task of ensuring the safety of future GM crops, according to CSPI. The FDA missed "obvious errors" in reviewing some GM crops, and biotech companies do not provide enough data to prove these foods are safe. The FDA has failed to establish firm procedures requiring companies to test for harmful changes in GM foods, such as increased level of anti-nutrients which could result from genetic modification. GM food developers failed to comply with requests for additional information and the FDA "had little choice but to complete its evaluation without the desired information". Data summaries from biotech companies "contained obvious errors that were not identified by FDA during its review process", toxicity and allergenicity testing was not always performed in optimal conditions, and the FDA did not generate its own safety assessment but merely summarised the developer's own food safety analysis.

Criticisms of a "moderate" consumer group

The CSPI is a Washington-based consumer organisation known according to the Washington Post (6.01.2003) for "its moderate stance on the use of genetic engineering to

alter food". Indeed, CSPI indicates a rather positive approach to GM food in its report through statements such as: "The enormous potential benefits from GE (genetically engineered) crops and food will be fully realised only if FDA's regulatory system is significantly upgraded and enhanced", and "Future GE food crops may include enhanced nutritional qualities and complex changes to a plant's metabolism, raising significant additional food-safety questions". The report cannot, therefore, be dismissed as the work of anti-GMO campaigners or "Luddites" who oppose the introduction of GM crops. In order to produce its report, CSPI obtained all publicly available information concerning 14 (or 26%) of the 53 submissions (Biotechnology Notification Files = BNFs) on biotech crops that have been filed with the FDA. CSPI's main criticisms deal with lack of data, obvious errors and inadequate guidance on safety tests. For example:

Requests for additional data from FDA were ignored by developers

In 3 of the 14 consultations, requests from the FDA to the biotech company for additional data were either simply "ignored" or the "developer affirmatively declined to provide the requested information". The FDA therefore completed those reviews "with less-than-thorough data summaries". In the case of BNF-34 for Monsanto's GM maize MON 809 and MON 810, composition data concerning substantial equivalence to non-GM and nutrient value was lacking for the vegetative (i.e. "green") part of the plant used as cattle food. Data was provided for MON 810 but not for MON 809 although the latter contains an additional engineered gene not present in MON 810. In a phone conversation "the developer noted that no composi-

tion data were available for MON 809, whereupon FDA responded that it would be "unable to respond to inquiries about MON 809 forage". The FDA's Notes to File conclude that: "Based on information Monsanto has presented, we have no further questions about corn (*maize*) products containing the MON 810 transformation event or *grain* obtained from lines containing the MON 809 translation event (*emphasis added*). In other example, BNF-24 involving Bt-176 maize (the first GM maize to be authorised in the EU under very contentious circumstances), the data summary again lacked composition analysis of the vegetative part of the plant. When the FDA indicated that it would be "helpful" if the company provided information about the nutritional value of the plants parts used as animal feed, the company supplied only the protein and CryIAb content of the vegetative parts of the crop. The developer "argued that if there were changes in the nutritional status of the plant, they would affect the agronomic properties as well". "Clearly FDA was not satisfied with the developer's arguments and data, but could not require additional data".

FDA missed obvious errors in data summaries

CSPI founds obvious errors in 3 of the 14 submissions it reviewed. "Had FA conducted thorough reviews", says CSPI, "the errors would have been easily detected". BNF-14 and BNF-60 - for GM slow-ripening tomatoes and cantaloupe melons respectively - contained errors concerning the SAMase gene taken from a bacterial virus T3, claiming that

human gut has prior dietary exposure to SAMase. Proper examination of the developer-supplied and cited papers by the FDA should have revealed these errors, according to CSPI.

Inadequate guidance on safety tests

The FDA is supposed to provide broad guidance to GM crop developers for determining the safety of GM crops rather than suggest specific types of safety tests or methods. CSPI investigated how developers analysed safety parameters such as crop toxicants and anti-nutrients, as well as the potential allergenicity and toxicity of GM proteins. It concluded that "developers do not evaluate all the compounds they should, and when they do, the methods they use are not always comparable to the contemporaneous state-of-the-art testing regimes". In particular:

- Toxicants and anti-nutrients that may affect food safety and nutrition are not always evaluated;
- Inadequate methods are used to determine allergenicity ;
- There is inadequate determination for the toxicity of GM proteins;
- Data summaries often lack sufficient detail of information to determine safety;
- Lack of guidance for determining that GM genes and proteins have not been altered in the transgenic plant.

Conclusions

Based on its findings, CSPI concludes that "it is clear that FDA's current voluntary notification process (even if made mandatory) is not up to the task of ensuring the safety of future GE crops". It therefore recommends the following changes to the GM crops authorisation system in the US:

1. Congress should provide FDA with legal authority for mandatory review and safety approval of GE crops, including the authority to require any data it deems necessary to conduct a thorough food-safety assessment.
2. The FDA should develop detailed safety standards and testing guidelines.
3. The FDA should require developers to submit not summaries of data, but complete details about their testing methods, the actual data from safety tests, and statistical analyses of those data.
4. The FDA should establish an approval process which is transparent and provides the public with an opportunity to comment on submissions.
5. The FDA should perform and make available to the public detailed assessments of commercialised GE crops.
6. The FDA should reassess the safety of commercialised GE crops if new safety concerns are recognised or new tests become available.

The report, which is available on <http://www.cspinet.org/new/200301071.html>, has apparently received little media attention, particularly in Europe. Its contents, however, have a particular significance in light of current EU debates concerning authorisation, labelling and traceability of GMOs for food and feed, especially bearing in mind that it was proposed (and is still demanded by some) that the EU should accept all GMOs which had been authorised in third countries !

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