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EU FOOD AND FEED CHAIN (FFC) CALLING FOR ADOPTION OF EFFECTIVE LEGAL MEASURES TO PRESERVE THE INTERNAL MARKET AND VITAL FEED AND FOOD SUPPLIES LINKED TO NEW EU GM CULTIVATION INITIATIVE

The EU Food and Feed Chain partners take note of the efforts of the European Commission to achieve a more rational, constructive and balanced debate among all interested parties on GMOs and to follow science-based decision-making, while ensuring freedom of choice for farmers and consumers, legal certainty for operators and the competitiveness of the EU feed and food chain.

However the EU FFC partners are deeply concerned by the new proposal regarding GM cultivation launched by the European Commission. We fear that the new initiative will not be sufficient and effective to solve the existing problems related to the implementation of the EU GM legislation for farmers and business operators.

The new Commission initiative fails to address the most urgent need of all EU food and feed chain operators for a clear, practical “technical solution” regarding trace levels of GM events not yet authorised in Europe, as first requested by the College of Commissioners in May 2008. The EU must tackle this crucial issue as a key working priority by recognising the reality of the sharp rise of the number GM crop events grown in key exporting countries (cf. [JRC report on the global GM pipeline, 2009](#)).

The lack of acceptance of a practical low-level presence along the entire food and feed chain is jeopardizing vital seed, food and feed supplies to the EU and the competitiveness of EU food and feed business operators.

EU FFC partners would therefore like to remind decision-makers at EU and national level of the following general principles that must guide discussions on the new legislative initiative in this sensitive area:

- The independent risk assessment by EFSA must remain the basis of the EU GM authorisation system. Any attempt to dilute the scientific basis of the current robust risk assessment methodology would ultimately lead to a loss of credibility of the EU's food and feed safety system putting at stake the hard-won trust and confidence of European consumers and operators of the EU food and feed chain.
- EU food and feed chain operators need more legal certainty with regard to the implementation of the EU GM legislation. The proposed re-nationalisation of the decision to ban the cultivation of EFSA risk-assessed GM crops will seriously undermine the “acquis communautaire” in the area of agriculture and food and feed safety. EU farmers, food and feed chain operators may face arbitrary, non-scientific decisions of national authorities related to the cultivation and co-existence of GM crops with conventional crops. This will lead to even more legal and commercial risks¹ against which operators can take no coverage.
- The new approach on GM cultivation sets a dangerous legal precedent jeopardizing the Internal Market for authorised products. In the absence of effective safeguard measures, EU farmers, food and feed chain operators fear the risk of exposure to uncoordinated actions by Member States which could lead to blocking products containing GM events “banned” on their territory.

¹ Diverging labelling thresholds for “GM-free” product and seed.

AAF (Association des Amidonniers et Féculiers)
a.v.e.c (Association of Poultry Processors and Poultry Trade in the EU)
CIAA (Confederation of the food and drink industries of the EU)
COCERAL (Comité du Commerce des céréales, aliments du bétail, oléagineux, huile
d'olive, huiles et graisses et agrofournitures)
COPA-COGECA (European Farmers and Agri co-operatives)
ESA (European Seed Association)
FEDIOL (The EU Oil and Proteinmeal Industry)
FEFAC (European Feed Manufacturers Association)
UECBV (European Livestock and Meat Trading Union)