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Concerns: proposal for a Directive on the adventitious presence of GMOs in conventional seeds

Dear Commissioners,

We write to inform you of our organizations' deep concerns regarding the proposal for a Directive setting thresholds for the unlabelled presence of GMOs in conventional seeds. The IUF is an international trade union federation representing workers throughout the food chain in 351 trade unions in 124 countries, including the countries of the European Union. EFFAT, the IUF's European regional organization, is a member of the European Trade Union Confederation, with 120 member trade unions in agriculture, food processing, hotels restaurants and catering in 35 European countries. The proposed directive is of direct concern to workers in these sectors, particularly as it could have a significant impact on employment and job security in the food processing industry.

European consumers strongly reject GMOs, and we know from experience that consumer confidence is the key to stable employment in this sensitive and economically vital sector. The recently adopted 0.9% threshold, and strict labeling requirements, are important elements in allowing consumers to clearly differentiate between non-GMO food products and those containing GMOs. Trade unions in the

agro-food sector have negotiated collective agreements with major companies affirming the employers' commitment to GMO-free production. The seed thresholds in the proposed directive would seriously undermine these efforts and consumer confidence in general.

The proposed thresholds (ranging from 0.3% for rapeseed to 0.7% for soya), rather than guaranteeing the agreed threshold of 0.9% in food and feed, would rapidly render it unworkable for a number of reasons. It would be impossible for conventional and organic farmers to guarantee the non-GMO character of their products and hence the products further downstream in the production process. Given the inevitable consequences of releasing GMO seeds into the environment, post-market monitoring and product recall measures would be impossible to enforce if seed contamination at the proposed levels is introduced with no label requirements. The potential employment impact would be dramatic. Wide-scale GMO contamination of conventional crops through the cultivation of GMO seeds is not a hypothetical possibility - it is an accomplished and well-documented fact.

Identifying and clearly labeling the products of GM seeds in compliance with the 0.9% threshold clearly requires that equally strict (and not looser, as the Directive proposes) safeguards at the level of seeds be implemented. Complimentary, not opposed, regulation is necessary. Shifting the responsibility for detecting contamination further downstream greatly increases the risks and costs. It relieves the seed industry of responsibility for guaranteeing the non-GMO nature of the seed stock, and imposes it on farmers, food processors and retailers. When GMO contamination is detected, the immediate burden will fall on workers in agriculture and food processing, who will pay with their jobs for this regulatory failure.

There is widespread support, including the support of workers in the agrofood industries, for the Directives on GMO thresholds in food and feed. We therefore consider it vital that technical and legal standards on seed reinforce these measures. We accordingly urge you to establish this at the level of 0.1%, a standard which the Austrian experience of the past two years has demonstrated is both feasible and necessary if we are to avoid the high risks and costs associated with GMO contamination.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'R. Oswald', with a long horizontal line extending to the right.

Ron Oswald
IUF General Secretary

Harald Wiedenhofer
EFFAT General Secretary