

Submission of Euro Coop European Community of consumer cooperatives

Euro Coop asks for strict measures on GM seeds to guarantee consumers' right to choose between GM and non-GM products

Euro coop welcomes the opportunity to comment on the Working document of the Commission Services on genetically modified seeds. It is essential to address the issue of GM seeds contamination in conventional seeds to ensure the effective implementation of consumers' right to choose between GM and non-GM foodstuffs. Already in 1998¹, Euro Coop expressed its concern about EU imports of raw material from the US and called for a complete segregation of GM and non-GM crops at source. We therefore welcome the Commission Services' initiative to propose new Community rules, which would harmonise and limit acceptable contamination of seeds by GM varieties.

However, Euro Coop is disappointed about the scope of the Working document of the Commission Services. We agree that it is necessary to set a threshold for the presence of genetic material in non-GM supplies since a low level of adventitious contamination is often unavoidable, but we insist that such thresholds must be practical and acceptable. We also believe that stricter measures should be taken to ensure the coexistence of conventional/organic and GM farming in Europe. Furthermore, we believe that no tolerance level should be accepted for non-authorised GM seeds.

We offer the following comments as a contribution to the development of the Commission's legislative proposals on GM seeds:

?? Thresholds for GM seeds

Euro Coop agrees with the Commission Services that the thresholds should be based on the Opinion of the Scientific Committee on Plants of 7 March 2001². We also consider that the thresholds for GM seeds should be set at a lower level than for food as it is thought that any adventitious DNA will clearly be amplified during growing. Different thresholds should be set depending on whether the crop is cross or self-pollinating.

However, Euro Coop stresses that a different approach should be taken for authorised and non-authorised GM seeds. Concerning authorised GM seeds, we agree with the thresholds proposed for swede rape and cotton, as they reflect what the SCP proposed. However, we are concerned about the 0.7 % thresholds for soya bean as it is not scientifically based. The SCP has not envisaged a 0.7% thresholds for any kind of seeds.

Furthermore, we are very concerned that the Commission Services envisage a tolerance for non-authorised GM seeds. We believe that adventitious GM presence may be permissible only where it relates to GM seeds already authorised for cultivation under Directive 90/220/EC or newly authorised under Directive 2001/18/EC. We consider that this proposal potentially compromises consumer safety and confidence. We believe, therefore, that there should be no tolerance for non-approved GM material.

?? Strict isolation distances should be set

Euro Coop agrees with the Commission Services that isolation distances should be set. We are of the opinion that no isolation should be set under 4 kilometres, given that it is proven that bees can fly such

¹ See *Euro Coop's concerns about the consumer's right to choose between GM and non-GM food products*, 13 May 1998, available at <http://www.eurocoop.org/publications/en/position/GMO98.asp>

² Opinion of the Scientific Committee on Plants concerning the adventitious presence of GM seeds in conventional seeds, http://europa.eu.int/comm/food/fs/sc/scp/out93_gmo_en.pdf

a distance. We also wish to underline that, in addition to isolation distances, a range of other measures currently used in seed crop management practices (e.g. the use of physical and pollination barriers) will influence the ability to achieve a thresholds in seed production. We believe that farm management and commercial production practices will influence the ability to achieve a 1% threshold in food and food ingredients.

?? Need to preserve non-GM supply for crops grown in Europe

The supply of GM-free raw materials from the US is posing more and more problems, as GM crops and non-GM crops are not completely segregated at source. This undesirable situation deprives European consumers of their right to choose between GM and non-GM products. Euro Coop finds this non-segregation unacceptable, and warns that it must not be repeated in Europe. Therefore, when GM crops are cultivated in Europe, we consider that they must be segregated, and we call on the European authorities to play an active role to assist in the establishment of the necessary facilities in this respect. Finally, we believe that valid sampling and testing methods should be developed in Europe.

?? A compensation scheme should be created in case of crops' contamination

Euro Coop is concerned that there is currently no compensation scheme for farmers whose crops have been contaminated by patented GM seed. The recent cases of GM contamination in Canada and in the US have shown that conventional and organic farmers must support the costs involved in involuntary or unavoidable gene transfer on the ground that they infringe patent rights.

Euro Coop believes that this situation is unacceptable, and that a EU fund should be created to compensate conventional and organic farmers. As it is difficult to prove the origin of the contamination, we suggest that the solution could be to create a European "contingency fund".

?? The thresholds should be adopted in a public, transparent, and democratic way

Euro Coop considers that the Standing Committee on Seed and Propagating Material for Agriculture procedure, Horti-Culture and Forestry does not allow for flexibility and transparency.

Contact:

Euro Coop Secretariat, 28 February 2002
Euro Coop
Rue Archimède, 17
B - 1000 Brussels

Tél. 00 32 2 285.00.70
Fax. 00 32 2 231.07.57
<http://www.eurocoop.org>