

Research Institute of Organic Agriculture
Ackerstrasse
CH-5070 Frick

Mr. David Byrne
EU Commissioner for Health and
Consumer Protection EU
Commission
Rue de la Loi 200
B- 1049 Bruxelles

Frick, 30. April 2002

Accidental or unavoidable (adventitious) presence of GM seeds in seed lots of non-genetically modified plant varieties

Comments on

Draft COMMISSION DIRECTIVE ../.../EC
of [...] amending Council Directives 66/400/EEC, 66/401/EEC, 66/402/EEC,
66/403/EEC,
69/208/EEC and 70/458/EEC on the marketing of beet seed, fodder plant seed,
cereal seed,
seed-potatoes, seed of oil and fibre plants and vegetable seed and Decision
95/232/EC on the
organisation of a temporary experiment in order to establish conditions to be
satisfied by the
seed of hybrids and varietal associations of swede rape and turnip rape
(Working document Doc.SANCO/1542/02- January 2002)

**submitted by Research Institute of Organic Agriculture, Switzerland
(FiBL.ch)**

Dear Sir

Notwithstanding Switzerland is not member of the European Union we take herewith the opportunity to comment on the Commission Directive mentioned above. As a member of the Swiss organic agriculture movement we are very concerned about the proposed thresholds for GMO contamination. Since Switzerland is highly dependent on import of seeds from European Union we are afraid, that our country is subsequently forced to adopt the EU standards.

We think such legislation should be based on the precautionary principle, guided by a clear strategy to guarantee the fundamental right of choice of consumers and farmers and aiming to protect the environment against a potential irreversible damage.

The Research Institute of Organic Agriculture therefore supports the Comments made by IFOAM EU group, Friends of Earth and Greenpeace International.

The proposed directive is contradictory to organic standards of EU-regulation 2092/91. To maintain the purity of organic seeds at the highest level, thresholds of contamination should be at the actual limit of detection of 0,1%.

We think that these thresholds must be based on regularly updated scientific data for each crop species. We therefore support the idea of regular reviews of the texts proposed by the Commission. Of course, any revision must take account of the further acquisition of knowledge on the subject.

Possible costs and additional constraints to guarantee this integrity should be met by those operators who intend to introduce GMOs and not by those who intend to stay GMO free.

The inspection and control system must be harmonised worldwide. Validated testing and sampling methods have to be established. We support the suggestion to develop a database on DNA sequences and analysis procedures that allow non-authorized occurrences to be detected.

The Research Institute of Organic Agriculture in Frick (FiBL.ch) in cooperation with the Research Institute of Organic Agriculture in Berlin (FiBL.de) launched this year a project "Avoid GMO contamination of organic seeds". The aim of this project is to develop a quality management system for organic seed production to avoid contamination with GMOs. We hope this project will give further information to decision makers for future directives regarding thresholds.

We thank the commission to carefully reading this letter. We ask you to take these observations into account, and would like to be kept informed on the results of this consultation procedure.

Yours faithfully

Dr. Urs Niggli

Director

Research Institute of Organic Agriculture, Switzerland (FiBL.ch)