

Brussels, 19 January 2004

A(03)24299 - D(04)7919

Mr. Donal Walshe
Secretary General
EUROCOOP
Rue Archimède 17-bte 2
B-1000 Bruxelles

Dear Mr Walshe,

Following your letter dated 16 December 2003 I would like to provide you with some information regarding the labelling thresholds for traces of genetically modified (GM) seeds in conventional seed lots.

As you will be aware the proposal to amend the Seeds Directives as a means to establish labelling thresholds for authorised GM seeds in conventional seeds has been temporarily suspended. This suspension has ensued because of the need to ensure that legal consistency can be achieved between thresholds established under the Seeds Directives and the provisions of Directive 2001/18/EC.

Whilst the scope of the two legal instruments is different and thresholds established under each would serve different purposes, the revised Seeds Directives would not remove the need to comply with the labelling rules of Directive 2001/18/EC. Further considerations have, therefore, been required so as not to impose inconsistent and impractical labelling provisions on operators (i.e. to avoid the situation where conventional seeds lots containing traces of authorised GM seeds below the relevant threshold established under the Seeds Directives would still need to be labelled under Article 21 of Directive 2001/18/EC).

Against this background, thresholds for authorised GM seeds will have to be established under Article 21(2) of Directive 2001/18/EC in order to disapply its labelling provisions for adventitious traces of such seeds.

The values of proposed thresholds will be further examined taking into consideration the common agricultural practices as well as what is practically feasible in field conditions.

To conclude I can assure you that the Commission is fully aware of the current situation concerning the need for thresholds for GM seeds and its implications on farmers, seed producers and consumers associations.

Yours sincerely,


Margot WALLSTRÖM