

## ***Ten arguments for clean seeds***

1. Monitoring and withdrawal of GMO approvals will become impossible unless farmers and national authorities know exactly where GMOs are present.
2. As seeds replicate and multiply it is impossible to control and predict the level of contamination resulting from initial levels seed-impurities.
3. It would also become impossible to restrict the approval and use of GMOs to certain areas for environmental or agro-ecological reasons.
4. Labelling of seeds is therefore not only for consumer information, but the prerequisite for proper risk-management and executing of the Unions GMO legislation.
5. If some GMO contamination has to be anticipated in all seeds on the market, farmers, food-processors and retailers will have to test whether the resulting contamination in the harvest and their products exceeds the level for mandatory labelling of GMO established for food and feed (0,9 %) in any case and all products.
  - a. This will massively increase the costs of non-GMO production and impose them on those who don't want to use GMO.
  - b. As the harvest is between hundred and eight hundred times the quantity of seeds the overall costs for the economy would be unnecessarily increased by magnitudes.
  - c. The establishment of GMO free regions or zones would become impossible.
6. Seed companies, which have a sophisticated system of purity control in place already, will have to test for the presence of GMOs in their products anyway. Therefore the establishment of thresholds, below which the presence of GMO need not be labelled, would in effect be a license for these companies to withhold essential information they have from their customers.
7. If GMOs are grown on a commercial basis in Europe in the future, additional contamination of non GMO fields and products along the production chain will occur. Should such unavoidable contamination add up to an initial contamination of seed, measures to prevent outcrossing, co-mingling and others forms of contamination will need to be respectively stricter in order not to exceed the labelling threshold for food and feed. Coexistence between GMO and non-GMO farming and food production will become even more difficult and costly and liability issues will become extremely complicated.
8. Organic farmers, who are legally obliged not to use any GMO in their production, could no longer use conventional seeds and reproduce organic seeds from conventional sources. They would be excluded from general seed exchange and seed development.
9. All farmers right to save and use seeds from their own production would be jeopardised as they would have to anticipate increasing levels of seed contamination in the second generation. While seed companies would profit from this fact, farmers' income would suffer as well as the diversity of cultivated seeds.
10. Seed testing conducted by national authorities since some years clearly prove that a purity level of 0,1 % has been achieved both in Europe and in seeds coming from countries where GMO are grown commercially. The Austrian Seed-law, which prohibits the use of any seeds contaminated with GMOs also shows that this purity level can be achieved without problems. Any threshold above the realistic detection limit of 0,1 % would in effect unnecessarily reduce the standards presently observed by the seed industry.