



Assuring Consumer Confidence in the Safety of Biotechnology and Food Products

Comments on the Commission Proposal to Establish a Food Safety Authority

A Paper by the Plant Biotechnology Unit of EuropaBio

In the wake of recent food scandals, European citizens do not have trust in the complex array of institutions responsible for assessing and ensuring food safety. The Plant Biotechnology Unit of EuropaBio supports the mission of President Romano Prodi and the European Commission to address the situation and accepts the Commission White Paper on Food Safety released on 12 January 2000 as a first step towards improving consumer confidence.

The remarks in this paper are confined to addressing the situation as regards novel biotechnology seeds and plant products and the assurance of their safety for use in the food chain, including the animal feed chain. The Plant Biotechnology Unit recognises that European citizens seek regulatory control of the seed and food industry, have a low level of trust in politicians to play this role and seek independent, high-quality institutions responsible for assessing human and environmental safety whom they can trust to be responsible for giving them accurate information and safeguarding their interests.

During the 90's, Europe has dismantled internal borders and created the single market, with the consequence that individual food chain products and food ingredients are traded more widely throughout the community and across National boundaries. At the same time the structure and operation of Europe's regulatory structures have not kept pace and still depend in the main on the nationally controlled systems which are often subject to national political control. This does not give confidence in food safety decisions which cross European National borders.

The Commission White Paper acknowledges that environmental policy plays an important role in ensuring safe food for the consumer. The Plant Biotechnology

Unit wishes to see scientific advice and communication concerning the environmental impacts of genetically modified plants (currently regulated under Directive 90/220) included within the remit of the Authority, to ensure the same level of scientific rigour and consumer confidence in decisions pertaining to environmental and food safety of genetically modified seeds and plant products.

Due to the current complex array of European and National Institutions involved in assuring regulatory oversight and safety, the Plant Biotechnology Unit agrees that the situation requires radical new proposals for an independent and co-ordinated regulatory system for assessing, inspecting and enforcing all aspects of the safety of genetically modified seeds and plant products which enter the food chain to provide and re-establish consumer confidence in their safety.

The Plant Biotechnology Unit believes it is ultimately the responsibility of policy-makers to make the policy decisions on the systems which are adopted and which create consumer confidence in these systems. However, in the interests of ensuring that decisions on product safety and compliance with control measures engender maximum public confidence, the Unit believes that the European Food Authority be should be granted decision-making powers in these areas.

The Plant Biotechnology Unit therefore *recommends*:

- That any new Authority created to evaluate food safety, also include within its remit all safety evaluations of seeds and plant products, especially those developed using biotechnology, including the environmental risk assessments
- That any authority created to carry out this task be given the authority to make final, binding decisions following safety assessments by units of the authority.
- That all Regulations and Directives relating to the regulation of seed and plant biotechnology products be amended to ensure comprehensive assessment of future products by the new authority (see references).
- That the new Authority also be charged with co-ordination and assurance of regulatory compliance in the field once products have been approved. This is the area of greatest concern to consumers.

The Plant Biotechnology Unit does not underestimate the challenges which will be involved in implementing such decisions, but believes that unless such radical and far-reaching steps are taken, efforts to improve consumer confidence

will be limited in their effect. The Unit therefore encourages the Commission to be bolder in making its proposals, especially in the arenas of decision-taking on product safety and ensuring and co-ordinating post-approval regulatory compliance.

The Plant Biotechnology Unit also notes that there are a number of existing models, some in Europe, which provide models of food safety structures that provide consumer confidence. They include Europe's existing Medicines Authority (EMA), Germany's Robert Koch Institute and the US Food and Drug Administration (FDA) and Environmental Protection Agency (EPA).

Reference:

- The Regulations and Directives that the Plant Biotechnology Unit recommends should be included within the remit of the Authority include:
- COUNCIL DIRECTIVE (90/220/EEC) of 23 April 1990 on the deliberate release into the environment of genetically modified organisms
- and its amendments.
- REGULATION (EC) No 258/97 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 January 1997, concerning novel foods and novel food ingredients and amendments specifically relating to labelling and the setting of thresholds for labelling.
- REGULATION (EC) No 1139/98 of 26 May 1998, concerning the compulsory indication of the labelling of certain foodstuffs produced from genetically modified organisms of particulars other than those provided for in Directive 79/112/EEC.
- COUNCIL DIRECTIVE 98/95/EC of 14 December 1998 amending, in respect of the consolidation of the internal market, genetically modified plant varieties and plant genetic resources, Directives 66/400/EEC, 66/401/EEC, 66/402/EEC, 66/403/EEC, 69/208/EEC, 70/457/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 on the common catalogue of varieties of agricultural plant species.

- The anticipated Directive/Regulation concerning novel livestock feed and feed ingredients