EuropaBio comments related to “Labelling of food enzymes, additives and flavourings produced by Genetically Modified Micro-organisms (GMM)”


EuropaBio does not support the re-tabling of amendments for labelling of food enzymes, additives and flavouring produced from or with GMOs (including Genetically Modified Micro-organisms). Today food ingredients (excluding processing aids) derived from GM plants, GM animals and food containing GM micro-organisms must have an indication of the GM status on the label. The same goes for food enzymes derived from GM plants or GM animals, and not used as processing aids.

On 22 September 2003 the European Parliament and the Council adopted two Regulations on GM food and feed1 and traceability and labeling of GMO’s and food and feed products produced from them2. On 24 September 2004 the Standing Committee on the food chain and animal health (section on genetically modified food and feed and environmental risk) clarified the scope of Regulation 1829/2003 by stating that: “food and feed (including food and feed ingredients such as additives, flavourings and vitamins) produced by fermentation using a genetically modified micro-organism (GMM) which is kept under contained conditions and is not present in the final product are not included in the scope of Regulation 1829/2003”.

EuropaBio welcomed the clarification by the Standing Committee as it allowed manufactures of food enzymes and additives to develop and put in place implementation measures of the Regulations (EC) 1829/2003 and (EC) 1830/2003 accordingly.

The amendments No. 9, 17 and 25 are not consistent with the justification put forward in their support. If the aim was to remain consistent with Reg. 1829/2003 and 1830/2003, those amendments would be irrelevant. If the aim was to include enzymes produced by GMO within the scope of the above Regulations (2003), this would be an arbitrary political decision which would be inconsistent with Reg. 1829/2003 and 1830/2003. Whatever the aim of the amendments was, it should be achieved by a broad regulatory discussion not by adding unclear and un-implementable recitals to a single branch of the FIAP package.

The proposed amendments are also in conflict with the current EU food labelling legislation which states that substances used as processing aids need not be labelled on the final food.

Products such as food additives and enzymes produced by fermentation with the help of GMMs do not contain GMMs or/and GMOs. A requirement for GM-labelling of such products would be impossible to control by analytical methods. As a result these amendments would make the FIAP regulation not enforceable on this point.

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1 (EC)1829/2003
2 (EC)1830/2003In the light of this EuropaBio is of the view that the Standing Committee’s Decision of 24
A request to label such products would put the European food additives/enzymes industry in a competitive disadvantage compared to non-EU producers, who would be inclined not to declare the GM origin of their products.

Due to consumers’ scepticism on GM technology this development could force food producers to revert to “conventional” production methods, which are less innovative, less efficient, less environmentally friendly and more expensive.

About EuropaBio
EuropaBio, the European Association for Bioindustries, has 85 direct members operating Worldwide, 12 associate members and 6 bioregions as well as 25 national biotechnology associations representing some 1800 small and medium sized enterprises involved in research and development, testing, manufacturing and distribution of biotechnology products. More information can be found on http://www.europabio.org

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