

## Contamination Thresholds for GM Seeds - 28th March 2004

To European Commissioners Wallstrom, Fischler and Bryne.

We are writing concerning the issue of thresholds for GM contamination of seeds, which we believe is to be re-submitted as a "new" Directive.

It seems that the latest proposed Seeds Directive is unfortunately and unbelievably the same as the previous Directive, that was so villified and widely rejected. It is incomprehensible that this could be the case, and once again and in the strongest terms possible we re-iterate our concerns and objections.

Allowing GM presence in conventional seeds of between 0.3% and 0.7%, is both unacceptable and unworkable.

The recent EU labelling legislation allows for 0.9% presence of GM in foodstuffs before labelling, but with the understanding that this will be reduced with improving detection measures. Even at this level "acceptable contamination" is mainly taken up by that proposed by the Seeds Directive. What is even more important, is that supermarkets across the EU, responding to consumer demand, actually operate at a 0.1% threshold of GM presence! If this Seeds Directive becomes law in its present state, we will see Supermarkets and food processors returning food products to source, across the EU, causing chaos in the industry.

There is a very simple, practical and cost effective solution, and that is to follow the example of Austria, who already have in place a regime allowing only 0.1% presence of GM in seeds.

We request that you reject the present proposals, and instead agree on a maximum 0.1% threshold for all GM presence in seeds. Further, this should be reduced as the technology allows.

If you cannot garner agreement to this, you must instead refer the issue to the European Parliament for consideration. Imposition of this present Seeds Directive is wholly unacceptable, and we gather that legal action is already being proposed from some quarters.

On this point re the European Parliament, we would like to refer you to the vote on 18th Dec 2003, where a large majority of the EP voted for the aforementioned minimal (0.1%) contamination of seeds by GM seeds. This followed its adoption by both the Environment Committee (4th November 2003) and the Agriculture Committee (2nd December 2003). We would also request that you push for the implementation of all the other issues adopted in these reports, when you next meet with your fellow

Commissioners.

Requiring non-GM seeds to be free of GMOs at the level of 0.1% is the only way to:

1. guarantee freedom of choice for farmers, industry and consumers,
2. minimise the costs for farmers, trade, processors, retailers and the public of maintaining non-GM production at the established threshold levels for food and feed,
3. minimise environmental and health as well as economic risks, and enable their practical management,
4. provide a simple and workable basis for "co-existence" between GM and non-GM farming and food production.

Consumers, and the electorates across Europe have consistently voiced their opposition to the presence of GM in foods. You are our representative, and surely must protect our interests, and not succumb to the lobbying of the GM multinationals. The present Seeds Directive allows unwarranted contamination of food and the environment, and undermines EU labelling legislation.