

**CONTRIBUTION TO THE ON-GOING DEBATE
ON GENETICALLY MODIFIED ORGANISMS (GMO)
AT THE ENVIRONMENT COUNCIL OF THE EUROPEAN UNION (EU)**

Brussels, 14 November 2008

The European GMO-Free Regions Network¹:

Considering that:

After the informal meeting of the Environment Ministers of the EU, 3 and 4 July 2008 in Paris, an "ad hoc" working group has been created by the French Presidency in the framework of the Environment Council of the EU in order to examine GMO on the following angles:

1. Environmental assessment and monitoring arrangements;
2. Socio-economic criteria;
3. Scientific evaluation process;
4. Thresholds for seeds;
5. Sensitive and/or protected areas.

This "ad hoc" working group on GMO, composed of Member States' representatives, aims to prepare conclusions on GMO for the Environment Council of the EU, 4 and 5 December 2008 in Brussels.

Reaffirms that:

1. Environmental assessment and monitoring arrangements:

- a) Must have the same level of accuracy in each Member State;
- b) Must take into account the context and the use of GMO on short, middle and long term, as much as their reactions with chemicals associated to;

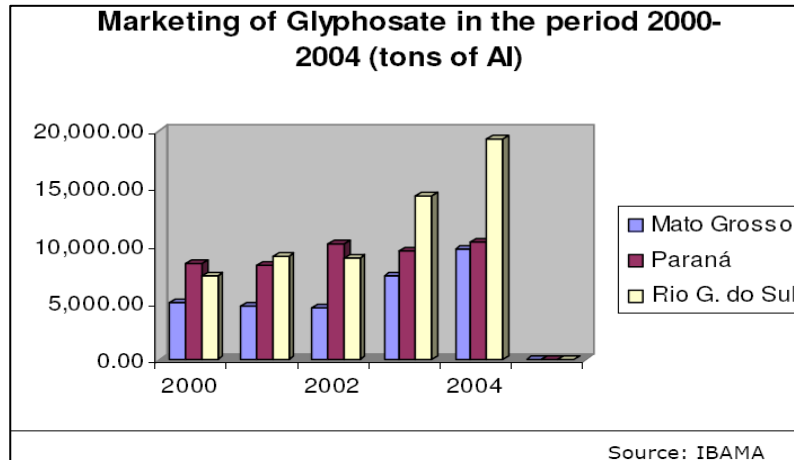
The environmental assessment should pay particular attention to:

- The long term potential effects of GMO;
- The changes in the use of associated chemicals (herbicide or pesticide).

In Countries where GMO are cultivated, an augmentation in the use of herbicide has been observed.

¹ Burgenland, Kärnten, Niederösterreich, Oberösterreich, Salzburg, Steiermark, Tirol, Vorarlberg et Wien (Autriche) / Wallonie (Belgique) / Sisak Moslavina et Varaždinska Zupanija (Croatie) / Euskadi, Menorca, Principado de Asturias et Gobierno de Canarias (Espagne) / Aquitaine, Bourgogne, Bretagne, Centre, Corse, Franche-Comté, Ile-de-France, Limousin, Midi-Pyrénées, Nord-Pas-de-Calais, Basse-Normandie, Haute-Normandie, Pays de la Loire, Poitou-Charentes et Rhône-Alpes (France) / Drama-Kavala-Xanthi et l'Union des Autorités Préfectorales (Grèce) / Abruzzo, Bolzano, Emilia-Romagna, Lazio, Liguria, Marche, Molise, Piemonte, Sardegna, Toscana, Umbria (Italie) / Highlands and Islands et Wales (Royaume-Uni)

The Table - below - was presented on October 2008 at the 2nd "Non-GM soy summit" in Brussels by the Professor Rubens ONOFRE NODARI - Manager (former) for genetic resources at the Brazilian Ministry for Environment, University of Santa Catarina.



Scientific studies showed that the herbicide roundup has the capacity to alter hormone profile and to affect the reproduction of the fish *Rhamdia quelen* (A.B. SOSO et al., 2006). Concerning the use of pesticide, the overall reduction in applications on BT crops seems significant only with broad-spectrum pesticide, not for specie-specific pesticide. Furthermore, BT toxins seem to potentially harm headwater stream ecosystems (E.J. ROSI-MARSHALL et al., 2007).

- c) Must be based on exchanges of expertises between the European Food Safety Agency (EFSA) and the Member States;
- d) Must be strengthened and harmonized at European level.

2. Socio-economic criteria:

- a) Must be considered in GMO risk assessment, with particular focus on national, regional and/or local impacts, and based on specifications defined at European level;

Socio-economic criteria for restrictions or exclusions of GMO should be taken into account - on a case by case basis - during the authorization process.

- b) Must be used, more specifically, in order to analyse the relevance of GMO with the national, the regional and/or the local protected areas², production areas, economies, employments, consumer demands, capabilities of adapting farming practices, mutations at landscape scale;
- c) Must be applied in GMO risk assessment by member States, Regions and/or Local Authorities considering its/their specific socio-economical model(s) of development.

3. Scientific evaluation process:

- a) Must be run out by EFSA
- b) Must benefit of an appropriate budget provided by EU and Member States;

² Proximity of natural protected sites, of seed production zones, of pastures, of beehives, of forest and mountain zones, etc.

- c) Must associate Member States through a national expert panel.

Member States should play an active role in the assessment process of GMO. The expertise in the field of GMO assessment should therefore be reinforced and better shared among Member States.

A list of experts nominated by any Member States should be identified. A panel of those experts should be randomly selected and consulted by the National Authority, which opens a new authorization process.

Independent research, funded by the EU and Member States, is necessary to ensure an effective evaluation of data provided (e.g. network of independent laboratories on GMO analysis and detection - coordinated by the University of Florence (Italy) - recently created).

4. Thresholds for seeds:

- a) Would allow contamination of seeds (the very basic product for any further agricultural productions) and would lead to the impossibility to reverse the process, if specific health or environmental problems associated to GMO are discovered;
- b) Must be set up, if it's needed, at the limit of detection level.

This is already done in some member States (e.g. Italy) without particular difficulties. The limit of detection level allows competent authorities to avoid:

- Cost for quantifications analyses;
- Risk during counter-analyses necessary to confirm the actual threshold.

This limit is already achievable by seed producers and it will allow avoiding impact on existent coexistence rules (i.e. current segregation measures shouldn't be revised to take into account specific seed thresholds).

5. Sensitive and/or protected areas:

- a) Must be defined on the basis of environmental, economic and/or social reasons and implemented by Members States, Regions and/or Local Authorities;
- b) Must also continue to possibly be implemented, as currently accepted by the European Commission, through voluntary agreements which however should be adapted to territorial realities.

Voluntary agreements on GMO-Free areas don't give sufficient attention to a smooth and efficient process in implementing those agreements on wide areas.

At the moment, a single operator who disagrees with the other can block such agreements. Member States, Regions and/or Local Authorities should be allowed to recognize such agreements also on a majority basis, if those agreements are taken with the mediation of farmer representatives and if they are put in place only for a determined period.