



GBE comments on Co-existence

*Meeting of the Commission Advisory Group on Rural Development
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Coexistence is in the competence of individual Member States

Upon the adoption in 2003 of EU regulations on traceability and labelling and on GM food and feed the earlier Directive 2001/18/EC on the deliberate release into the environment of GMOs was amended to allow for the possibility of measures for co-existence at Member State level. Many of the factors that determine what is efficient and cost-effective best practice are specific to national and regional characteristics and farming practices, which vary greatly from one Member State to another and within national territories themselves. A “one-size-fits-all” approach is therefore not appropriate.

Farmers have practiced coexistence for generations so as to capture the economic value associated with different product types and to meet the demands of a wide variety of customers.

Stewardship through locally-designed and implemented “Good Agricultural Practices”, and active dialogue and information among neighbouring farmers and stakeholders in the supply chain, enable coexistence to be achieved. This is demonstrated by 10 years of experience in Spain with the cultivation of Bt maize. This allows for quality standards to be met in different ways in the varied agricultural environments in different parts of Europe.

EuropaBio calls on the European Commission and on Member States themselves to ensure that the rules which Member States put in place meet the Commission’s guidelines on co-existence published in July 2003. These guidelines provide a rational basis to set in place **workable, efficient, cost-effective and proportionate** procedures to meet the statutory labeling requirements, which co-existence measures are intended to promote.

Coexistence measures are not designed to avoid environmental or health risks

The issue of co-existence refers to the ability of farmers to provide consumers with a choice between conventional, organic and GM products that comply with European labelling and purity standards. Co-existence is not about environmental or health risks

because only GM crops that have been authorised as safe for the environment and for human health can be cultivated in the EU.

The EU legislation for assessing the safety of GM crops is widely recognized as being the most stringent in the world. Thus, GM crops that are offered to European farmers have passed extensive food, feed and environmental safety standards prior to their approval for placing on the market and are as safe as their traditionally developed counterparts.

Coexistence measures should be workable, efficient, cost-effective and proportionate

Measures should be efficient and cost-effective, without going beyond what is necessary to comply with EU threshold levels for GMO labelling.

Flexible, pragmatic coexistence schemes based on good agricultural practices can already be achieved without developing additional national or EU legislation. EuropaBio supports the Commission's approach published in the July 2003 guidelines. These provide for a general framework which builds on existing agricultural practices, thus recognising the different needs of different agricultural regions while respecting the principle of "proportionality" in relation to the desired objective – that is, **to allow conventional and organically grown produce to meet the Community labelling standard with GM adventitious presence levels below 0.9%.**

Such an approach will allow for local measures to be adapted to local conditions on a case by case basis. This will require collaboration between farmers and other operators in the supply chain so that freedom of choice is available for all European farmers and consumers.

Building on decades of experience with existing segregation practices approaches to co-existence should be developed in a transparent way, based on scientific evidence and in co-operation with all concerned parties. They should ensure an equitable balance between the interests of farmers of all production types.

Coexistence measures should not go beyond what is necessary in order to ensure that levels of AP in non-GM crops stay below the EU labelling threshold

Coexistence measures must focus on the feasibility and costs of management practices that aim to minimise the unintended presence of GM in non-GM produce. These measures should aim to respect the 0.9% labelling threshold for food and feed, including organic products, recently established in European legislation through the co-decision procedure.

EuropaBio considers that growers who have themselves chosen a more stringent labeling standard than that established in EU legislation should not expect their neighbours to bear the special management costs of meeting that self-imposed standard; to do so would reverse fundamental freedoms of economic activity and would establish a dangerous precedent. Specialty operators who create extra-legal standards

for levels of GM in their own produce should not be allowed to force their neighbors to bear the costs of such self-imposed standards. To do so would effectively deny the right of other farmers to make their own choices about types of products and markets to pursue.

Certain sources of GMO admixtures cannot be completely avoided

Agriculture is based on biological processes and takes place in an open environment. Therefore, certain sources of GMO admixture cannot be completely avoided. GMO admixture can be considered adventitious if it results from natural processes (such as pollen transfer by wind or insects, or seed shedding during harvest). Where techniques to prevent admixture during certain farm operations do not exist or where the application of such techniques would be beyond reasonable economic feasibility, such admixture is to be considered technically unavoidable.

Thresholds are also valid for organic food and feed products

Coexistence measures must focus on the feasibility and costs of management practices that aim to minimise the unintended presence of GM in non-GM produce. These measures should aim to respect the 0.9% labelling threshold for food and feed, including organic products, recently established in European legislation through the co-decision procedure. (Regulation (EC) No 834/2007).

EuropaBio considers that growers who have themselves chosen a more stringent labeling standard than that established in EU legislation should not expect their neighbours to bear the special management costs of meeting that self imposed standard; to do so would reverse fundamental freedoms of economic activity and would establish a dangerous precedent. To allow specialty operators to formulate unrealistic standards for GM in their own produce would impose impossibly high standards on neighbors and would effectively impose a ban on the choice of other producers.

Definition of scope: farm gate

The scope of the activities encompasses farm level crop production from sowing up to the first point of sale.