



Dacian Ciolos

*Commissioner for Agriculture
and Rural Development*

European Commission

Copy to: Georg Häusler, Head of Cabinet; Alina Ujupan, Member of the Cabinet

Subject: Protection of food and farm sector from GMO contamination

Dear Commissioner,

We are representing farm workers and workers in the food industry, beekeepers, small and medium farmers, organic farmers and the organic food chain in Europe.

With this letter we call on you as the Commissioner responsible for agriculture and the development of rural areas to support farmers, beekeepers and other important operators in the food sector that contribute significantly to the economic vitality of rural regions to maintain their work and livelihoods and take action on the following issue: The European Commission is working on proposals claiming to give member states more possibilities to implement bans on the cultivation of genetically-modified crops. In these proposals, we neither see the situation of small, medium and organic farmers or beekeepers reflected, nor solutions for food enterprises that provide products to meet consumers' demand for food that is free from genetically-modified organisms (GMO).

Already today, farmers, beekeepers and food processors in Europe face problems with GMO contamination, resulting in serious income losses and the need to change the kind of crops they grow – this often leads to financial problems that are threatening the economic existence of entire farmsⁱ, and similar problems can be observed throughout the food sector.

As a majority of farmers, beekeepers, food enterprises and consumers reject the use of GMO in food and farming, an EU wide ban on the cultivation and importation of GMOs would be the best solution to protect GMO-free food production. As a minimum requirement, legally-binding and EU-wide rules that protect the maintenance of GMO-free farming for all those who want to stay GMO-free and that finally implement the polluter-pays principle must be established to guarantee the right for GMO-free food and farming and to avoid any negative socio-economic impacts on the farming sector and on food enterprises.

The current proposals in preparation by the European Commission in reality seem to be part of a general attempt to increase the use of GMOs in food products as well as the cultivation of GMO in the European Union. We strongly criticise this approach, as it does not reflect the interests of the majority of consumers, nor does it take the economic existence of GMO free farmers, beekeepers and food enterprises into consideration. The new proposals of the Commission are not favourable to a GMO-free Europe. They do not provide legal certainty to member states, farmers and food operators to stay GMO-free. Furthermore, it is impossible to imagine the free circulation and commercialisation of GMO seeds, and the prohibition of cultivation of GMOs in a single member state as proposed by the Commission.

These proposals are initiated by Commissioner Dalli and DG Sanco. We now call on you as the Commissioner responsible for the farming sector to defend farmer's rights and the economic existence of the whole food sector, especially with regard to the problems GMO free farms might further face with contamination and existential economic losses should such policy proposals be carried through.

The situation in Europe can be described as follows:

1. The majority of consumers inside and outside the EU demand GMO-free products. European food production has the potential to deliver high-quality, GMO-free food. This is a competitive advantage, and high-quality, GMO-free food production can significantly contribute to a positive rural development, as long as farmers, beekeepers and other operators in the food chain are able to meet consumer demand for GMO-free food.
2. Genetically-modified crops and other organisms are in no way necessary to guarantee food security or as reaction towards changing environmental conditions.
3. Keeping their products free of GMOs is not only a necessary undertaking for farmers, beekeepers and other operators in the food chain in order to meet consumers' demands. It is also a legal requirement. The European legislation sets a labelling threshold for traces of GMO in other products (0.9%), but this threshold is only valid for adventitious and technically-unavoidable traces. All technically possible measures have to be taken to avoid any contamination of seed, crops and honey with GMO.
4. Farming in the EU with its single market of seed and farm products, and especially small farms and small field structures are very vulnerable to field-to-field and cross-border contamination with GMOs.
5. The introduction of GMOs in the European Union was always accompanied with the **promise for freedom of choice**. We claim to have the freedom of choice to maintain GMO-free food, feed and farming - and need a European legislation that guarantees this right.

The farmers, beekeepers and food enterprises behind this letter reject GMOs on their farms and in their business, due to the reasons mentioned above, due do the fact that GMOs are incompatible with their farming principles and due to other reasons related to independency

of farming, health, cultural, ethical or environmental concerns.

We therefore urge you to effectively represent farmer's and food producers' and to advocate for their rights for GMO-free production within the Collège of Commissioners. The right to maintain GMO-free production, without compromises regarding any contamination thresholds that are neither foreseen by legislation, nor desired by consumers or food producers, must finally be implemented.

We trust that you will consider our arguments and bring the severity of farmers', beekeepers' and food producers' existence into the debate with your Commission colleagues.

Yours sincerely



Manfred Hederer, President German Professional Beekeepers



Arnd Spahn, Sectoral Secretary for the Agriculture sector, EFFAT



Josie Riffaud, European Coordination Via Campesina



Christopher Stopes, President IFOAM EU Group



Fdo.- Miguel López Sierra, Secretary-General of COAG – IR

List of signing organisations:

Deutscher Berufs und Erwerbs Imker Bund

The German Association of professional Beekeepers represents the interests of professional beekeepers in politics. www.berufsimker.de

EFFAT

EFFAT is the European Federation of Trade Unions in the Food, Agriculture and Tourism sectors resulting from the merger concluded between two European trade union federations, the ECF-IUF and EFA, on 11 December 2000. As a European Federation representing 120 national trade unions from 35 European countries, EFFAT defends the interests of more than 2.6 million members towards the European Institutions, European industrial federations and enterprise management. www.effat.org

European Coordination Via Campesina:

The European Coordination Via Campesina regroups the organisations formerly gathered in the European Farmers Coordination (CPE 1986-2008) and other farmers' and agricultural workers' organisations of Denmark, Switzerland, Italy, the Netherlands, Spain, Greece, and Turkey. www.eurovia.org

IFOAM EU Group:

The IFOAM EU Group is the European working level within the International Federation of Organic Agriculture Movements. It brings together more than 300 organisations, associations and enterprises from all EU-27, EFTA and candidate countries. IFOAM's goal is the worldwide adoption of ecologically, socially and economically sound systems that are based on the principles of Organic Agriculture. www.ifoam-eu.org

COAG

COAG (Coordinadora de Organizaciones de Agricultores y Ganaderos) is the Coordinator of farmers' and livestock farmers' organisations in Spain.

ⁱPublications about economic costs of GMO contamination and prevention in the food sector:

- Economic impacts of labelling thresholds for the adventitious presence of genetically engineered organisms in conventional and organic seed, study published by IFOAM EU Group 2009: http://www.ifoam.org/about_ifoam/around_world/eu_group_new/positions/publications/pdf/IFOAMEU_GMO-freeSeedStudy.pdf
- Schadensbericht Gentechnik, Bund Ökologische Lebensmittelwirtschaft (Hrsg.) 2009: http://www.boelw.de/uploads/media/BOELW_Schadensbericht_Gentechnik090318.pdf
- Testimonies of Contamination, published by Greenpeace 2009: <http://www.greenpeace.org/raw/content/international/press/reports/testimonies-of-contamination.pdf>
- Bello A; Porcuna JL; González V; Fabeiro C. 2007. Organic Farming integrity in maize cultivation in Spain. In: Stein AJ & Rodríguez-Cerezo E (2007). Third International

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Agricultural Supply Chains. Seville 20-21st of November 2007 (Book of abstracts) 373-
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