codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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AGENDA ITEM NO. 5 (B) **CX/FL 02/06-ADD.2**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING
THIRTIETH SESSION
HALIFAX, CANADA, 6 - 10 MAY 2002

Proposed Draft Recommendations for the Labelling of Foods Obtained Through Certain Techniques of Genetic Modification/Genetic Engineering (Proposed Draft Guidelines for the Labelling of Foods and Food Ingredients Obtained Through Certain Techniques of Genetic Modification/Genetic Engineering): Labelling Provisions (CL 2001/43-FL, Alinorm 01/22A – Appendix V)

Government Comments At Step 3

COMMENTS FROM:

CONSUMERS INTERNATIONAL (CI)

PROPOSED DRAFT RECOMMENDATIONS FOR THE LABELLING OF FOODS OBTAINED THROUGH CERTAIN TECHNIQUES OF GENETIC MODIFICATION/GENETIC ENGINEERING (PROPOSED DRAFT GUIDELINES FOR THE LABELLING OF FOODS AND FOOD INGREDIENTS OBTAINED THROUGH CERTAIN TECHNIQUES OF GENETIC MODIFICATION/GENETIC ENGINEERING): LABELLING PROVISIONS (CL 2001/43-FL, ALINORM 01/22A – APPENDIX V)

GOVERNMENT COMMENTS AT STEP 3

CONSUMERS INTERNATIONAL (CI):

Consumers International (CI) appreciates the opportunity to comment on the latest proposed Draft the Guidelines on Labelling of Foods Obtained by GE/GM.

The latest draft proposed recommendations are basically sound as written, with some of the minor changes CI proposes below, and should be advanced in the step process.

Detailed comments:
Consumers International appreciates the efforts of the Drafting Group to incorporate the "comprehensive labelling" option supported by India and Norway. This option provides consumers with the information they want and need. We offer the following comments on the Guidelines as currently drafted.

Section 1.0 SCOPE
CI supports the new layout of this section into three sub-sections, which makes clear that there are various labelling options that CODEX member countries can use. CI supports the full mandatory labeling option as spelled out in 1.1.3.

Section 2. DEFINITION OF TERMS
CI supported the present set of definitions as part of a compromise to move the definitions to step 8. Now that the definitions have been sent back to step 3, we can continue to support the present definitions, but only if it is made clear that the wording on the label may be different-more understandable to consumers-than what appears in the definitions section.

For the definition section, we understand the logic of using "modern biotechnology," as this is the term used by other Codex fora, such as the Ad Hoc Task Force on Foods Derived from Modern Biotechnology, as well as the definition in the Cartagena Protocol on Biosafety. We also think that the other definitions in the section should remain. But we do not think the term "modern biotechnology" should be permitted on food labels as it is too vague and misleading to consumers. Surveys of CI's member organizations throughout the world clearly show the preference for the term "genetically modified" or "genetically engineered," rather than vague terms such as "product of modern biotechnology," "product of gene technology," etc. which are too vague and not understandable to consumers.

Section 3.0 LABELING PROVISIONS

Section 3.3. We support deletion of square brackets around this entire section, since this is an important health protection matter. We also support the deletion of the internal square brackets around "or present in altered proportions having regard to accepted limits of natural variation."

Finally, we feel that the proper language for the end of the sentence is "shall" rather than "should," to make this section parallel to the wording in Section 3.2.

Section 3.4(b). We support removing the square brackets around "and/or other parameters"

Section 3.5. We support use of the term "ethical, cultural and religious consideration" in place of "ethical objections," as we feel the former term is more precise than the latter. The section should retain the word "should", not "may" because consumers have a right to know such information.

We also support deletion of the square brackets around the second sentence since consumers will benefit from the clarity such criteria would provide.

Section 4.0. THRESHOLD LEVELS

We support deletion of the entire section on Thresholds. If there are any detectable residues of protein or DNA resulting from gene technology, the product should be labeled.

Section 5.0. EXEMPTIONS

We urge this section be deleted, since it undermines comprehensive labelling. However if it is retained, we particularly object to the inclusion of "highly processed food ingredients" in the list of examples.

Highly processed ingredients often constitute virtually the entire contents of a food product--for example the corn in corn flakes. Exemption of highly processed ingredients could turn a labelling program into a meaningless effort, and one, which was highly misleading to consumers.

If the intent of this section is to allow for exemptions of items which are present in extremely small quantities in processed food, then this should be made clear and would make this section more acceptable. In that case the phrase "that are present in extremely small quantities" should be added after the word "ingredients."

Section 6.0 LABEL DECLARATIONS

Section 6.2. All the alternative wordings for labels which are suggested here that include the term genetically engineered or genetically modified will provide adequate information to the consumer. Thus, the square brackets should be removed from alternatives (a), (b), (d), (e), (g) and (h). However alternatives (c), (f) and (i)--which refer to products of biotechnology or gene technology--are unacceptably vague and indefinite and should not be recommended by Codex.

Section 7.0. IMPLEMENTATION

We support removing the square brackets from this entire section because, in our view, it offers guidance which may helpful. We also believe that the words "to facilitate tracing" should be added to the second sentence (addition in bold) so that it reads, "These include, but are not limited to: development of validated detection methods, establishment of verification (for example, documentation) systems to facilitate tracing; and efforts for the development of supporting capacity and infrastructure." This addition

should be made to make this document more consistent with the documents (particularly the Draft Principles for the Risk Analysis of Foods Derived from Modern Biotechnology) forward to Step 8 at the 3rd meeting of the Ad Hoc Task Force on Foods Derived from Modern Biotechnology.