

**NOTE OF FSA OPEN MEETING TO DISCUSS ISSUES ARISING FROM
THE PRESENCE OF VERY LOW LEVELS OF GM INGREDIENTS IN
FOODSTUFFS. 1 March 2001.**

List of Attendees

Chairman	- Rev Professor Michael Reiss
Agriculture Development and Advisory Service (ADAS)	- Ms N Smith
Adgen Foods	- J McGegor and R Langley
Agricultural Environmental Biotech Commission (AEBC)	- Mrs A Packer
Alpinetreat Ltd	- Mr R Warren
Azteca Milling L.P	- Mr J Riley
BBC News	- Ms K Randle
British Retail Consortium (BRC)	- Ms J Nunn
British Society Plant Breeders (BSPB)	- Dr Ward and Mr Ruthven
Central Science Laboratories	- Dr S Oehlschlager and Mr J Dennis
Christian Ecology Link	- Mr Short and Mr R Tringham
Consumers Association	- Ms S Davies
Cornell University	- Mr J Lezaun
Co-Op Group Ltd	- Mr C Maddock
Cropgen	- Prof. V Moses
DETR	- Dr A Butt
Environment Council	- Ms S White
Eurofins	- Dr K Williams and Mr A Parker
Federation of Bakers	- Mr J Sanders
Friends of the Earth (FoE)	- Mr P Riley
Food and Drink Federation (FDF)	- Dr J Gray and Mr J Wood
Food Matters	- Mr B Hendley
French Embassy	- Mr Clement
Five Year Freeze	- Ms C Deveraux and Mrs Clarke
Grain and Feed Trade Association (GAFTA)	- Ms S Peake
General Public	- Ms A Sampson

General Public	- Ms F Williams
Genetics-Id	- Dr J Fagan and Mr J Koester
GM Food, UK and World News	- Mr M Williamson
Greenpeace	- Mr A Tait
Harcourt Public Affairs	- Ms C Irving
Health Food Manufacturers Association (HFMA)	- Ms P Viner
Hemel Hempstead GM action Group (HHGMAG)	- Ms J Worth
HHGMsAG & Biodynamic Agriculture Association	- Mr R Krist
LACOTS	- Dr A Majid Katme and Mr L Bailey
Law Laboratories	- Mr Griffiths and Ms L Patterson
Leatherhead Research Association	- Dr B Hanley
Laboratory of the Government Chemists (LGC)	- Dr N Harris and Dr C Terry
Linda McCartney Foods Ltd	- Mr Treharne
London University	- N and J Miller
Marks and Spencer (M&S)	- Ms F Aylward and Mr M Totten
Mission Foods	- Mr N Houghton
Monsanto	- K Magin and Dr Clemence
National Consumer Council (NCC)	- Mrs S Dibb
National Farmers Union (NFU)	- Dr V Barber
NERA	- Ms J Young
Nuffield Council on Bioethics	- Ms T Lezemore
Public Analyst	- Dr J Searle and Ms C Stevens
Reading Borough Council	- Mr A Pollard
Red Mill Snack Foods Ltd	- Ms A Hatton and Mr G Neild
RHM Technology	- Dr G Wiseman and Dr R Woolley
Safeway	- Mr P Raynor
Sainsbury's	- Mr B Pitcher and Ms R Wilson
SCIMAC	- Dr R Turner and Mr D Pearson
Snack Nut and Crisp Manufacturers Association (SNACMA)	- Mrs S Chandler
Social Issues Research Centre	- Mr N Pettifor
South Bank University	- Mrs D Ojinnaka
Syngenta	- Mr S Smith and Mr I Weatherold
Tepnel Bio Systems	- Ms K Balden

The Vegetable Protein Association	- Mr D Dyer and Ms J MacGregor
University College of London (UCL)	- Ms G Llobet
United Kingdom Register of Organic Food Standards (UKROFS)	- Ms D McCrea
Unilever	- Mr S Beggs
United Biscuits	- Ms K Gordon and Mr Polasik
Vega	- Mr A Long
Weston Research Labs Ltd	- Mrs C Vallis
Whitbread plc	- Mr T Miller
Food Standards Agency (FSA)	- Dr Jon Bell
	- Mr Nick Tomlinson
	- Dr Clair Baynton
	- Mrs Gail Jones
	- Mr Mark Woolfe
	- Mrs Mary Howell
	- Mrs Chester Wood (FSA Scotland)
	- Dr Jane Cockram - Minutes
	- Miss Ruth Dadswell - Minutes
	- Mr Adam Hardgrave - Registrations
	- Mr Mark Bowden - Microphones
	- Mr José Edmund - Microphones

GM Foods Open Meeting Summary

The open meeting was intended to consider issues that might arise from the presence of low levels of genetically modified material in foodstuffs on sale in the UK. All participants were given the opportunity to present their views to the Agency. This was followed by a more general discussion of some of the issues raised.

Certain speakers commented that some consumers did not wish to consume GM foods for a variety of reasons and that they should be in a position to avoid them altogether if they wished. Others noted that food production was now a global business and that GM crops were already grown and consumed on a very large scale so complete avoidance may no longer be possible. Some also made the point that there were no known food safety issues associated with the GM crops currently being grown commercially for food production around the world.

It was noted that within Europe an extensive regulatory framework now exists for controlling the sale of GM crops and foods. Detailed labelling rules also exist for GM foods. The meeting was informed that the European Commission was considering the scope for further extending these labelling rules and introducing requirements for traceability. However, ultimately the effectiveness of any legislation is determined by the extent to which it is enforceable.

Some speakers suggested that there was a need for greater understanding in the debate on food safety and consumer choice. There were many aspects of food production that consumers were unfamiliar with, partly as a result of a decreased awareness of farming practices. There was a clear need for greater consumer information, although it was recognised that food labels could not convey all the necessary information. Other methods of providing accurate information to consumers such as utilising bar code scanners need to be explored.

Many of the speakers welcomed the opportunity to represent their views at an open meeting. Some speakers suggested that similar events should in future be held at times that would enable more consumers to attend. During the discussion a number of broad themes emerged.

THRESHOLDS

A number of participants stated that consumers were unwilling to accept even low levels of adventitious contamination of GM material in their food. Others commented that zero tolerance was impractical, due to the high levels of GM crops being grown across the world, and the difficulties associated with harvesting and processing crops separately.

It was also suggested that since thresholds were already used for the unintentional presence of other substances found in food, it would be appropriate to use thresholds for the presence of GM material where all reasonable efforts had been made to source only non-GM material. However, such thresholds must be practical and enforceable.

IDENTITY PRESERVATION (IP)

It was pointed out that the greater availability of guaranteed non-GM food crops was largely a result of the increased demand placed on US growers by British food manufacturers. To ensure the integrity of such non-GM supplies UK food manufacturers and retailers were working closely together to develop robust identity preservation (IP) systems.

The maintenance of seed purity was generally considered to be paramount for the preservation of non-GM food crops. Although routine testing is carried out to determine seed purity, at present there are no specific criteria for the presence of GM varieties in seed supplies.

Several speakers felt that IP systems were more robust than simply relying on GM detection methods to identify the presence or absence of GM material in the final food. Some suggested that all foods should be capable of being traced back to their source using IP systems to guarantee their non-GM status. Others noted the potential costs involved could result in some non-GM foods being priced off the market.

It was acknowledged that IP systems could not provide an absolute guarantee that a crop would be 100% GM free. Substantial amounts of GM crops are being grown in the world. In the US GM crops account for 50% of the soya harvest and 30% of maize. Therefore although non-GM crops can be

delivered, some believed that a small degree of contamination had to be accepted.

DETECTION METHODOLOGY

Some local authorities suggested that most testing is currently qualitative in nature, and although quantitative methods are also being considered, there is a need for more method validation.

The existing threshold of 1% for the adventitious presence of GM material in non-GM ingredients was set on the basis of the ability of analytical methods and the ability of the supply chain to deliver. It was noted that this threshold only applies to EU approved varieties, although consideration needs to be given to whether there is a case for another threshold for non-EU approved varieties which have been approved elsewhere.

Current technology can accurately quantify GM content down to a level of 0.1%. Nevertheless existing techniques are considered in some instances to be unreliable and unreproducible. It was suggested that either a generic testing method is required which can be used with all GM systems or standard methods and tools need to be established. New methods, which do not rely on Polymerase Chain Reaction (PCR) methodology are being developed.

It was suggested that there should be discussion between commercial analysis companies, to resolve conflicting differences in results. It was also felt that there should be global sharing of methodologies from which everyone could benefit.

The need for standard reference materials and validated methods suitable for use in public analyst laboratories was also raised. Public analyst labs reported that resources available for GM testing in their labs are presently insufficient. The issue of distinguishing between authorised and non-authorised was raised. It was suggested that biotechnology companies should be required to provide detection methodology details and reference materials for each modification prior to EU approval being given.

LABELLING

It was felt that the right of the consumer to choose whether to eat GM food was paramount, and labelling plays a major role in this.

The need for labelling of GM foods and products from animals which have been fed on GM feed was raised. The additional workload on local authorities to carry out testing was acknowledged. The cost implications would also need to be critically assessed.

There were differences of opinion on the basis of GM labelling. Some suggested that labelling should be linked to traceability. Others suggested that, as now, labelling should be based on the detection of novel DNA or protein in the final foodstuff.

Some felt that manufacturers should provide more detailed labelling, giving more information about the source of their ingredients, perhaps in the form of information leaflets available with the products at the supermarket.

Others objected completely to the use of the technology and stated that they wished to completely avoid all genetically modified foods and products from animals fed on GM plant material. They felt that if foods were clearly labelled, they would be able to achieve this.

Some suggested that consideration should also be given to the labelling of foods manufactured using enzymes or other processing aids made using GM technology even if not GM themselves.

A general comment was made that the public does not know enough about the food they already eat, and that more information about food in general would be useful. This issue needs to be addressed before people can begin to understand the changes being made to food crops. Similarly it was suggested that, although labelling was one means of providing consumer information, there was scope for improving access to authoritative information on biotechnology.

ALLERGENICITY

It was commented that the incorporation of foreign genes into food could increase the incidence of allergic reactions particularly if genes that had not been well characterised were introduced into a GM crop. It was suggested that any food containing a transgene from a potential or known allergenic organism must be labelled as such.

It was pointed out however that allergenicity is not a concern solely associated with GM foods as many conventional foods may also elicit an allergic response.

ANIMAL FEED

Some speakers suggested that consumers did not want products from animals fed on GM derived feed to enter the food chain, or where they did, they should be labelled.

Others suggested that meat or other products from animals fed GM containing material should be labelled.

CONCLUDING REMARKS

In closing the meeting, Nick Tomlinson thanked all those present for their constructive contributions to the debate. He drew attention to the fact that the European Commission had announced plans to revise labelling rules for GM foods. The information from the meeting would be used to inform the forthcoming discussion in Brussels on GM labelling and the Agency would be consulting widely once the Commission proposals were published. He went on to note that amongst the points that had emerged during the meeting was the fact that legislation is only as good as its enforceability. A comment had been made that the cost implications of additional labelling should be considered to ensure that non-GM foods are not priced out of the market. The Agency was looking at the costs and benefits of additional labelling measures. On the issue of thresholds, Nick Tomlinson noted that some had advocated a zero threshold, whilst others had noted that absolute zero was not achievable. There had also been a suggestion that there should be clear and accessible information on genetic modification of foods in addition to product labelling.