

GM(O)-free labelling in the EU: comparison of existing schemes

*Conference on GMO-free labelling of
food products*

6 March 2013, European Parliament



Various GM(O)-free schemes exist in the EU/EFTA countries, including private and public schemes

| | Private schemes | Public schemes |
|---|---|--|
| Distinct GM(O)-free label | Carrefour, Auchan, COOP, Loué, UNI, IKC UM, REWE | DE, AT, FR, NL [GR, LU, HR] + CH & South Tyrol FI - guidelines |
| GM(O)-free integrated into label that signals other attributes | Ecolabels and other quality labels | Organic, PDO/PGI, regional labels |
| GM(O)-free integrated into supply chain standards with no label | Heumilch, Lidl, COOP, Coldiretti, Rondeel, Svenk Mjök, UK retailers & producers | <i>Belgium & Sweden – prohibitive legislation</i> |

Public and private schemes have various objectives

Consumer protection / provision of information

- **Enabling consumer choice**
(AT, DE, FR, NL + supermarkets, manufacturers, producers)
- **Avoid consumer confusion** (UK)
- **Information should not be misleading** (NL, SE)

Market development

- **‘Closing the gap’ on food labelling at EU level - animal products**
(AT, DE + Carrefour)
- **Enable economic operators to produce ‘GM(O)-free’ products**
(AT, DE)

In some cases national and/or EU-level action is desired – in its absence private operators and public authorities have developed their own schemes (IKC UM, NL)

GM(O)-free labelling is allowed where there is an equivalent GM food / feed product on the market

- MS that have regulated allow eligible products to be labelled 'GM(O)-free' if they meet certain conditions (AT, DE, FR, NL)
- The legislation can set conditions on the use of GM(O)-free labelling for processed products (e.g. FR - only products with non-GM ingredient = 95% of total product weight and other ingredients are not subject to the labelling requirements)
- Some private operators restrict GM(O)-free labelling to products from a particular animal species or of a particular type or extent of processing
 - COOP animal and processed products
 - Carrefour meat, eggs, farmed fish
 - Loué poultry meat and eggs

National rules specify the words that may be used and in some cases provide for a logo for GM(O)-free products

- National legislation specifies the particular words that may be used to identify a product as 'GM(O)-free', but does not specify a logo (FR, NL)
- National guideline specifies the particular words that may be used but does not specify a logo (AT)
- National legislation specifies the words that may be used and government supports and owns a single logo (DE)
- In FR, NL, AT and DE private operators may use their own logo, if they follow the national rules

A wide range of labelling approaches have been taken by Member States and private operators

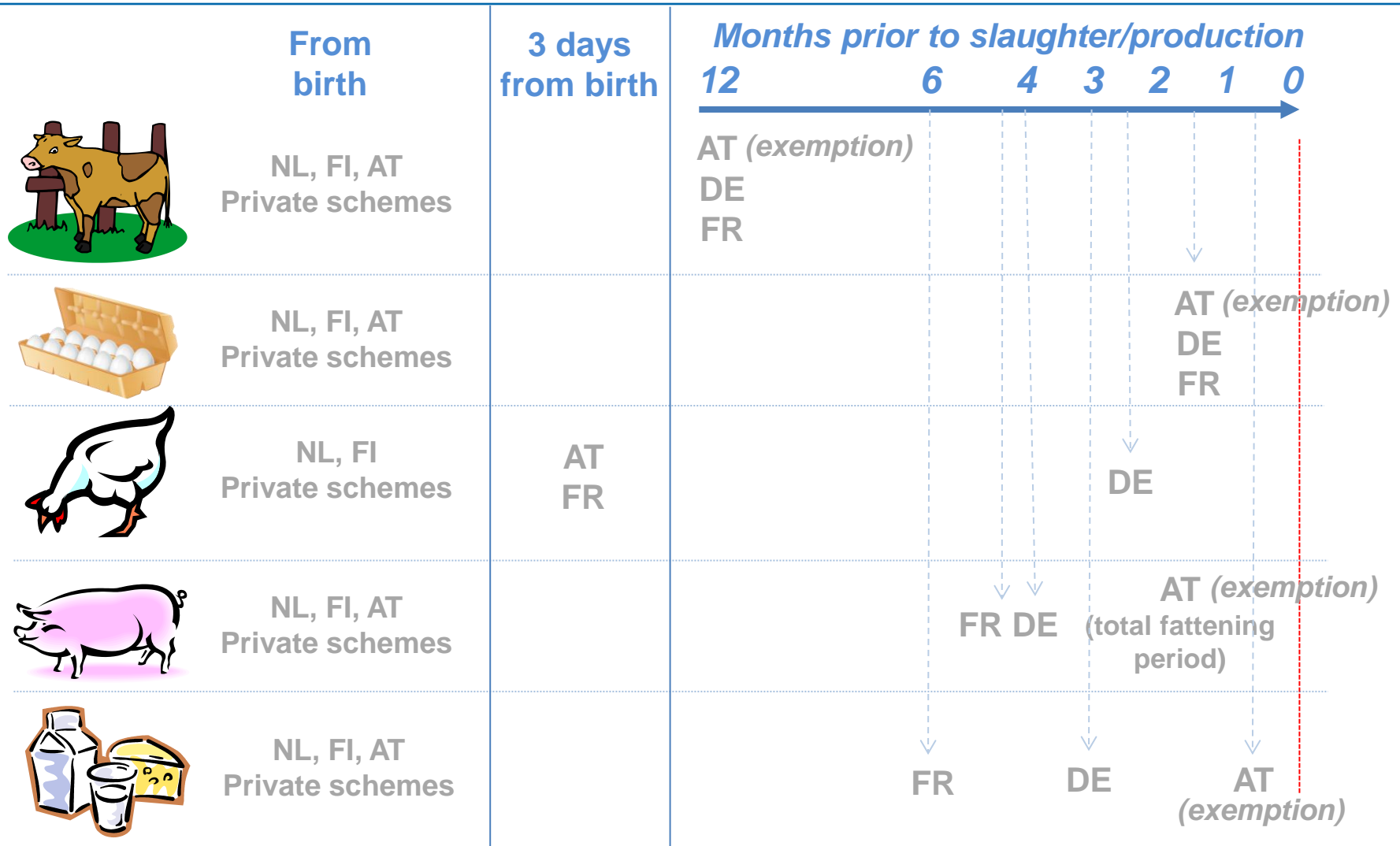
- **Germany:** 15 operator-designated (own design) labels are currently used alongside the designated label, but the products must comply with national GM(O)-free production requirements
- **Italy:** No logos are used to designate GM(O)-free products, but a range of different wording is used
- **France:** Carrefour and Loué labels pre-dated the legislation and have been updated to comply with the new rules
- **Slovenia:** IKC UM has developed wording and a designated logo for GM(O)-free products
- **UK:** A number of products carry wording indicating they are 'GM(O)-free'
- **Sweden:** GM(O)-free labelling is illegal but has been found in use on some products

Thresholds for GM presence vary by scheme and in some cases vary by whether they apply to food or feed

| Public schemes | FI | NL FR | DE FR | AT* |
|-----------------|--------|---|-------------|----------------------------|
| Private schemes | | Biocoherence UK operators (feed only) | COOP UNI | IKC UM Some Label Rouge |
| Food | '0.0%' | <0.1% | <0.1% | <0.9% |
| Feed | '0.0%' | <0.1% | <0.9% | <0.9% |

FR – two possible thresholds for feed
DE and NL – the threshold is '0.0%' but <0.1% is the threshold used
AT – legal provision according to EU Regulations 1829/2003 and 1830/2003, but in practice operators apply a <0.1% threshold (detected contamination below 0.9% requires further controls)
COOP and UK operators – own-branded products only

Minimum non-GM feeding periods vary by livestock category



AT – operators aim for non-GM feeding from as soon after birth as possible
 FR – non-GM feeding period for pigs is $\frac{3}{4}$ of their total lifespan, or approx 4.5 months prior to slaughter

Rules regarding GM / GMO-derived inputs and exemptions vary by scheme and product type (food vs. feed)

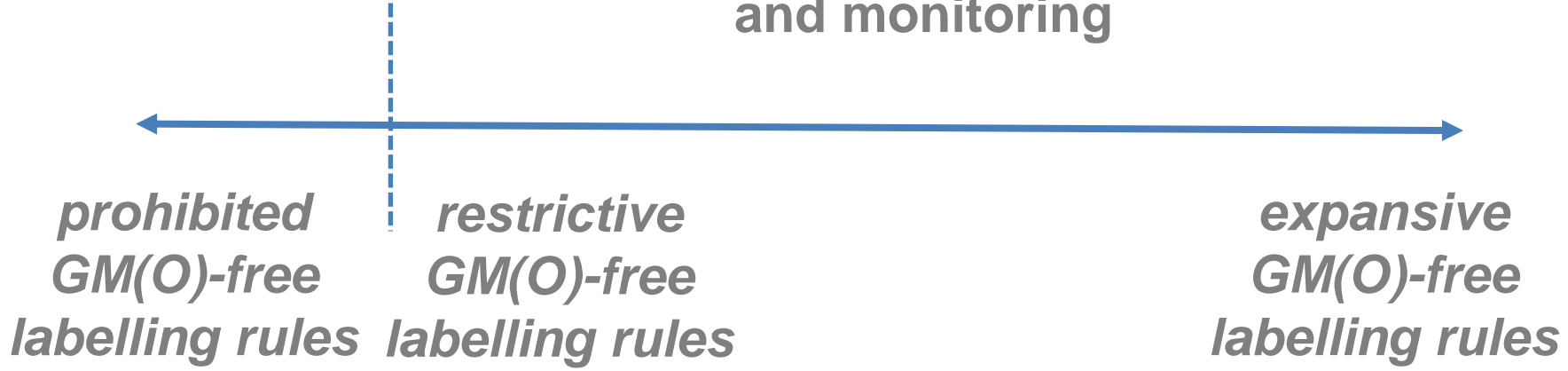
| | Input | Exemptions may apply | No Exemptions |
|------|--|--|--|
| Food | Preparation aided by GMO derived compounds or processing aids | AT, DE, FR | FI, NL |
| Feed | <ul style="list-style-type: none">- GM feed- Feed containing GM additives- Veterinary pharmaceuticals produced with modern biotechnology | AT, DE FR* *(veterinary pharmaceuticals unspecified) | FI NL* *(veterinary pharmaceuticals allowed) |

Certification, control and monitoring requirements are included in some, but not all schemes

- Most schemes have ***process-based requirements*** – monitoring and control activities are conducted on the inputs rather than the final products (FR is product-based for food)
- Individual operator certification required + guidelines for self-control, compulsory monitoring (AT)
- Guidelines for operators to demonstrate self-controls and:
 - Documentation to governing body and verification by federal authorities (DE)
 - Third party checks and verification by national authorities (FR)
- Risk-based inspections by national authorities (NL)
- Private schemes use a combination of audit and inspection throughout the supply chain by the retailer / manufacturer and / or a certified third party

Summary – GM(O)-free labelling approaches vary across a number of dimensions

- Product scope
- Labelling rules
- Threshold levels
- GM(O)-free inputs/exemptions
- Certification, control and monitoring



Thank you!



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