

Workshop

Non-GMO labelling – a functioning tool to keep agriculture GMO-free

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Our Content for Today



- Status quo:
 - Shortcomings of the existing EU legislation
 - Snapshots on two successfully operating non-GMO labelling systems
- „The non-GMO boom“: Market developments in Austria & Germany
- Market examples: Key factors for success
- Non-GMO @Europe: Status quo of the transition process
- Need for harmonization of non-GMO standards
- The next level: European non-GMO Association
- Non-GMO production: Beneficial impacts on agriculture & food production



Shortcomings of EU-legislation 1829/2003



The „labeling gap - # 1“:

- Feed containing GMO has to be labelled as GM
- however:
NOT food products derived from animals fed with GMOs
→ **significant impact on the import of GMO soy!**





Shortcomings of EU-legislation 1829/2003



The „labeling gap - # 2“:

- EU regulation 1829/2003 covers food and feed produced ‘from’ a GMO; but **not** food and feed ‘produced with’ a GMO
- **Processing aids** which are only used **during** the food or feed **production process** are **not included** (e. g. enzymes)
- Food and feed manufactured **with the help of genetically modified processing aids** is **not included** (e.g. vitamins produced by GM microorganisms)
- Thus, **products obtained from animals fed with genetically modified feed or treated with genetically modified medicinal products** will be subject neither to the authorization requirements nor to the labelling requirements referred to in this regulation





National regulations – 2 exemples



Austria:

- 1997: 1,23 mio. signatures against GMO in food & agriculture
- 1997: first “Definition for GMO-free food” by ARGE Gentechnik-frei
- 1998: “Guideline for definition of GMO-free production” (Codex Alimentarius Austriacus), regularly adapted and modified
- Labels: “**Gentechnik-frei erzeugt**” (1998 - 2012) and “**Ohne Gentechnik hergestellt**” (since 2013)
- “Labeling gap” in EU-regulation 1829/2003 as major impulse for non-GMO market
- Non-GMO production now: **acknowledged quality standard** of Austrian food





National regulations – 2 exemples



Germany

- May 2008: **legislation** on labelling of non-GMO food
- Two seals: „ohne GenTechnik“ (for food since 2009), „VLOG geprüft“ (for feed since 2017)





Key pillars of non-GMO Standards




- **Food & feed products, additives and auxiliary products:**
 - are non GMOs or GMO derivatives
 - don't contain GMOs or GMO derivatives
 - for food products and additives in food production: no production with the aid of GMOs or GMO derivatives
- Clearly defined **conversion periods for animals** (e.g. entire life time, fattening period)
- **Thresholds for contamination:**
 - only valid when **adventitious and technically unavoidable**
 - feed: max. 0,9%
 - **food:** D = max 0,1%; A = „as low as possible“; in practise: 0,1%
- **Certification and monitoring**
 - compulsory and regular monitoring by external, accredited certification bodies
 - system based on: self monitoring, risk based controls, external certification
- Clearly defined **form of labelling**
 - Wording, logo
 - Austria: reference to standard, naming of certification body





Certification in Practice: e.g. with Milk



Flow of goods	Monitoring
<p>Feed Producers</p> <ul style="list-style-type: none"> • separate production lines / plants for GMO-free feed • certified feed catalogue (infoXgen.com) <p>Agricultural Products Traders</p> <ul style="list-style-type: none"> • sale of loose feed and soy – for self-mixing 	<p>100 % Monitoring – 1x per year</p> <p>Key inspection points:</p> <ul style="list-style-type: none"> • recipes • mass flow • schedule & scope of analyses
<p>Milk Farmers</p> <ul style="list-style-type: none"> • exclusive use of feed from feed catalogue (infoXgen.com) • frequency of monitoring depends on risk classification 	<p>100 % Initial Survey / Monitoring</p> <p>Key inspection points:</p> <ul style="list-style-type: none"> • assessment of risk classification • survey of feed used for all animals on the farm • recipes • mass flow
<p>Dairy Company</p> <ul style="list-style-type: none"> • separate transport / handling / processing of GMO-free milk 	<p>In the following years: Monitoring according to risk classification</p>
<p>Consumer</p> <ul style="list-style-type: none"> • Final product labeled „Ohne Gentechnik hergestellt“ 	<p>100 % Monitoring – 1x per year</p> <p>Key inspection points:</p> <ul style="list-style-type: none"> • Separate processing, recipes, correct declaration of products



Prerequisites for labelling (example: Austria)



1. Compliance with the standard: **Guideline on Definition of "GMO-Free Production" of Food and its Labelling** or alt.: **EU Regulation on Organic Production (34/2007)**
2. Valid contract with one of the **inspection & monitoring bodies** that are
 - accredited by the relevant authority (Ministry of Economy)
 - authorized by ARGE Gentechnik-frei
3. **Certification** – not older than 3 months
 - Compliance with **"Guideline on the Risk-based Monitoring of GMO-free Production"**
4. Conclusion of a **license agreement** with ARGE Gentechnik-frei
5. Current and valid **membership** with ARGE Gentechnik-frei (membership fee = license fee; calculated on the base of staff numbers)
6. **Formal approval** of use of label by ARGE Gentechnik-frei
7. **Regular information** on products utilizing the label "Produced Without GMO" on the market to ARGE Gentechnik-frei; in written form
8. **Annual renewal** of certification



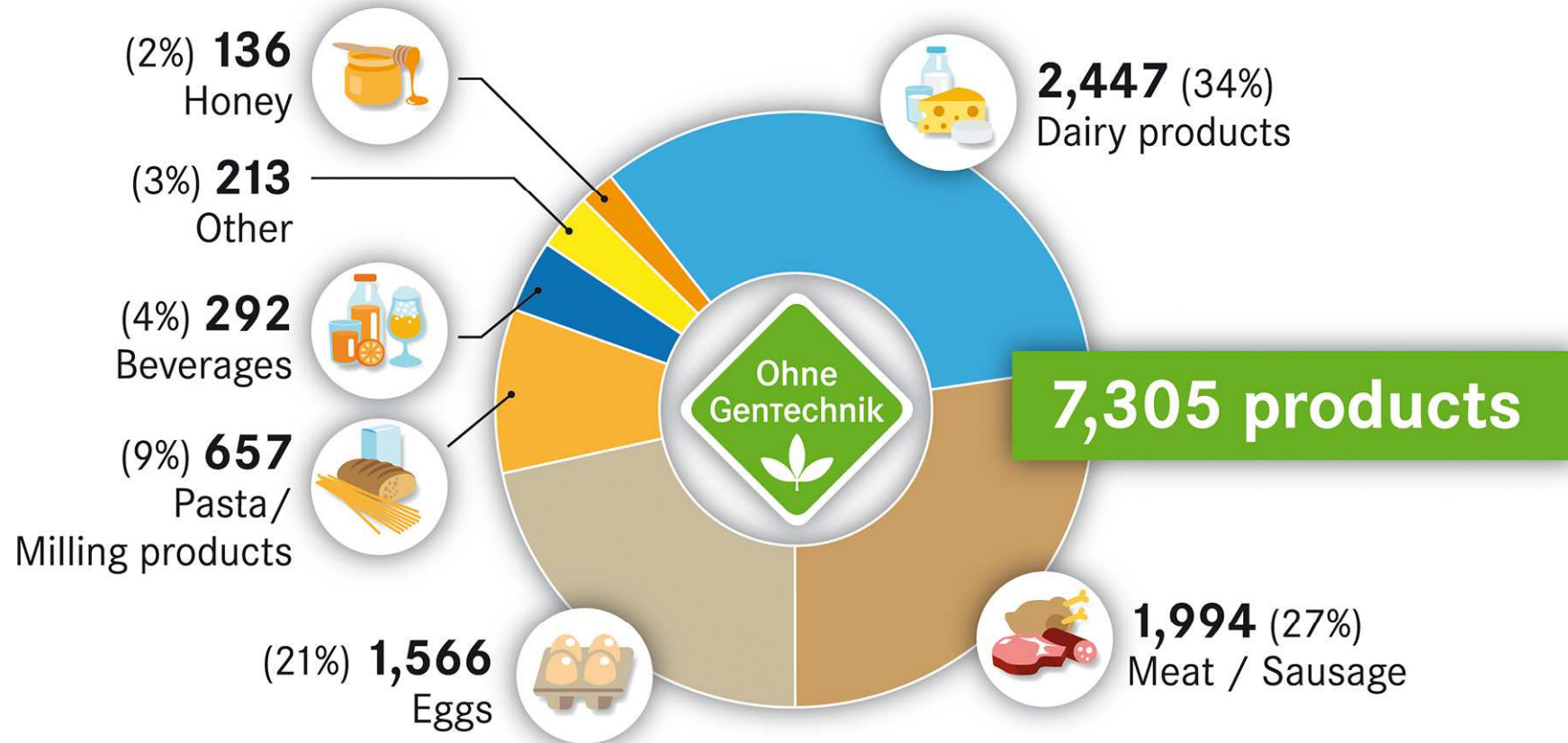
Market Development in Austria

OHNE
gen
TECHNIK
HERGESTELLT

- More than **3.500 products**
- App. **1,5 billion € annual turnover**
- Several market segments **completely non-GMO**:
 - **dairy products** (since 2010)
 - **eggs** (since 2010)
 - **poultry** (since 2012)
- more than **90% of Austrian retail**
→ important driving force from the very beginning!
- **leading brands & producers**
→ non-GMO has been turned into special quality standard for Austrian products
- **high credibility** with consumers
 - 74%: „label is credible & trustworthy“
 - 64%: „label is important for purchasing decision“

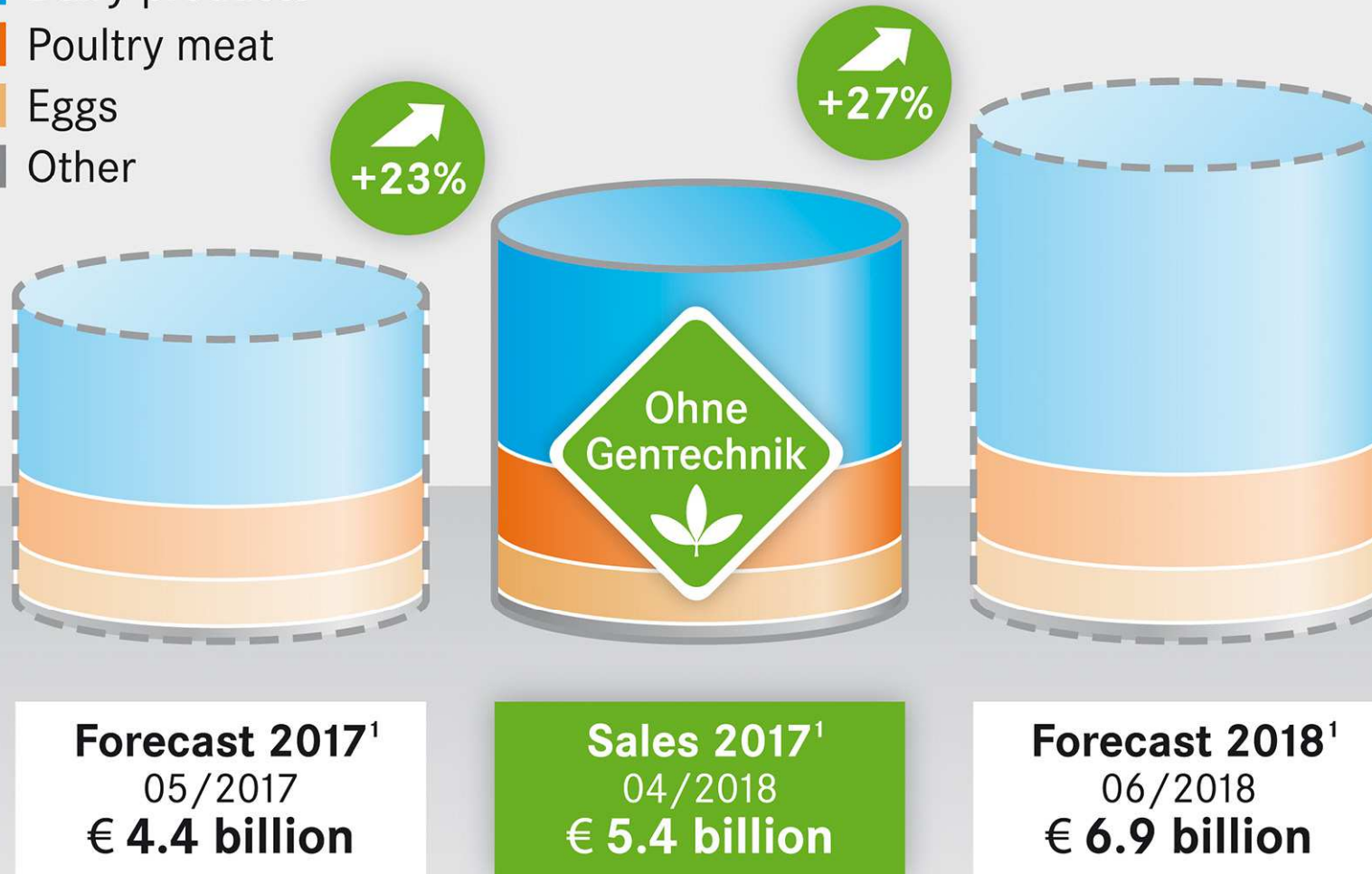


Use of the “Ohne GenTechnik” [Non-GMO] Seal by Product Categories



Sales Development of "Ohne Gentechnik" [Non-GMO] Food by Product Categories

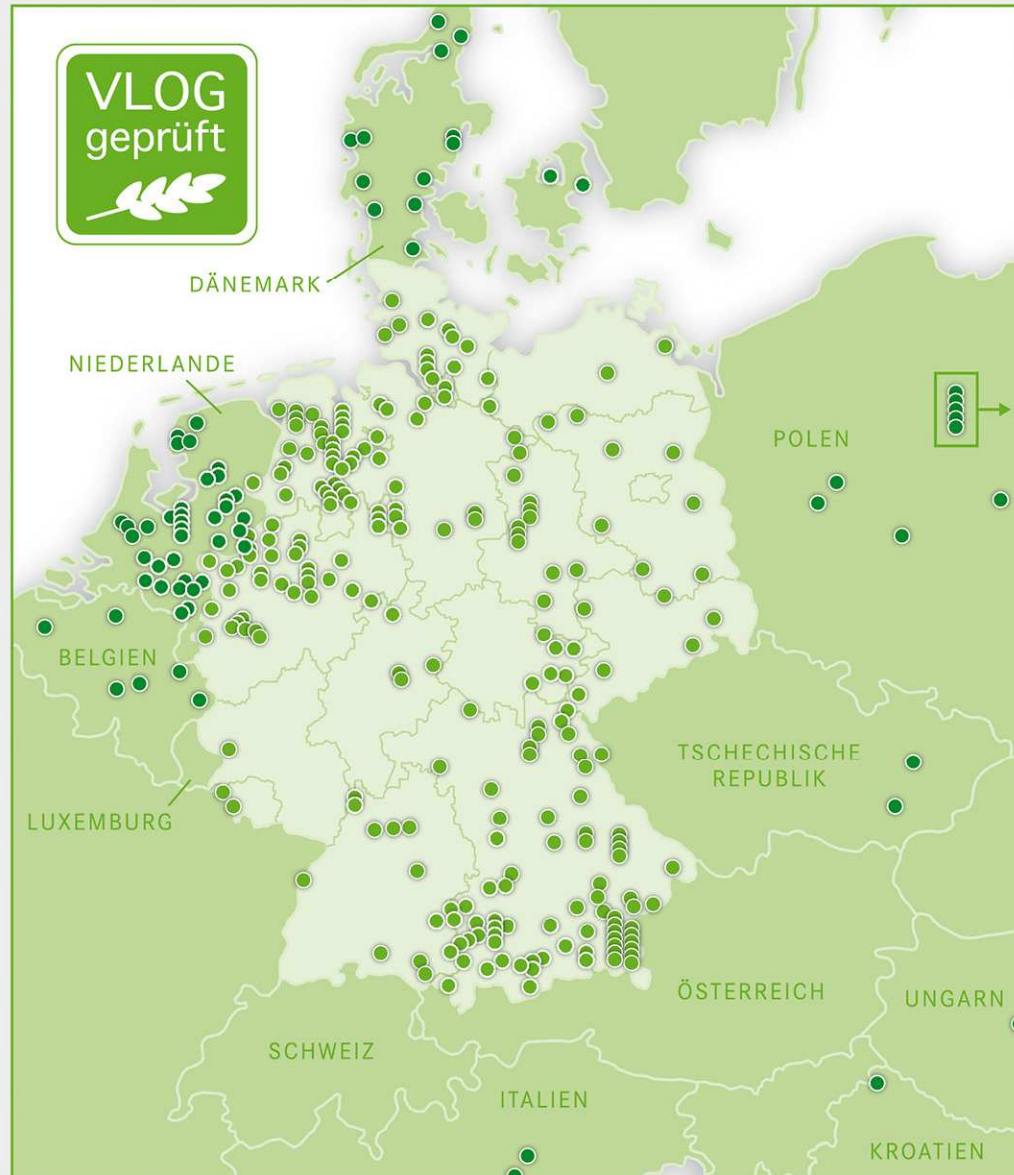
-  Dairy products
-  Poultry meat
-  Eggs
-  Other



¹ Turnover of manufacturing industry for food, licensed for the "Ohne GenTechnik" [Non-GMO] – own enquiry

„Ohne Gentechnik“-Futtermittel

297 Unternehmen zertifiziert nach VLOG-Standard



 Deutschland	226	 Niederlande	36
Bayern	74	 Dänemark	14
Niedersachsen	47	 Polen	9
Nordrhein-Westf.	37	 Belgien	6
Schleswig-Holstein	13	 Italien	2
Baden-Württemb.	12	 Tschech. Rep.	2
Sachsen-Anhalt	10	 Kroatien	1
Brandenburg	9	 Ungarn	1
Thüringen	6		
Sachsen	5		
Hessen	4		
Mecklenburg-Vorp.	3		
Hamburg	2		
Saarland	2		
Bremen	1		
Rheinland-Pfalz	1		
Berlin	-		

„VLOG geprüft“ = Nicht gentechnisch verändert gemäß VO (EG) Nr. 1829/2003 und 1830/2003

Nicht dargestellt: Zertifizierungen entsprechend der Richtlinie zur Definition der „Gentechnikfreien Produktion“ von Lebensmitteln und deren Kennzeichnung im Österreichischen Lebensmittel-Codex und dem französischen Standard OQUALIM + STNO werden als gleichwertig zu einer VLOG-Zertifizierung anerkannt.

Eigene Erhebung, Stand 01.06.2018

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Key Factors for Success



- Strong **anti-GMO attitude in society**
 - Austria: referendum against GMOs in agriculture and food production in 1997
 - all opinion polls in Germany: more than 70% against GMOs
 - strong support in [media &] civil society / NGOs
- **Regulation:** legislation, voluntary agreement (guidelines)
- Clear, transparent, well-proven and trusted legal **framework for labelling**
- **Multi stakeholder platforms** – with a full integration of all relevant players (production, retail, agriculture; civil society; politics)
- **Consistent and comprehensive system:**
 - 1 production standard – 1 label – 1 certification standard – monitoring
- **Only one label on the market**
- **Strong demand from retailers** for non-GMO labelling (esp. for own brands); retailers as **major drivers** for non-GMO labelling
- Products that are **clearly requested by consumers AND retailers**

Non-GMO Food Regulations in Europe

Regulations on non-GMO labeling **in place**

Regulations on non-GMO labeling **planned**

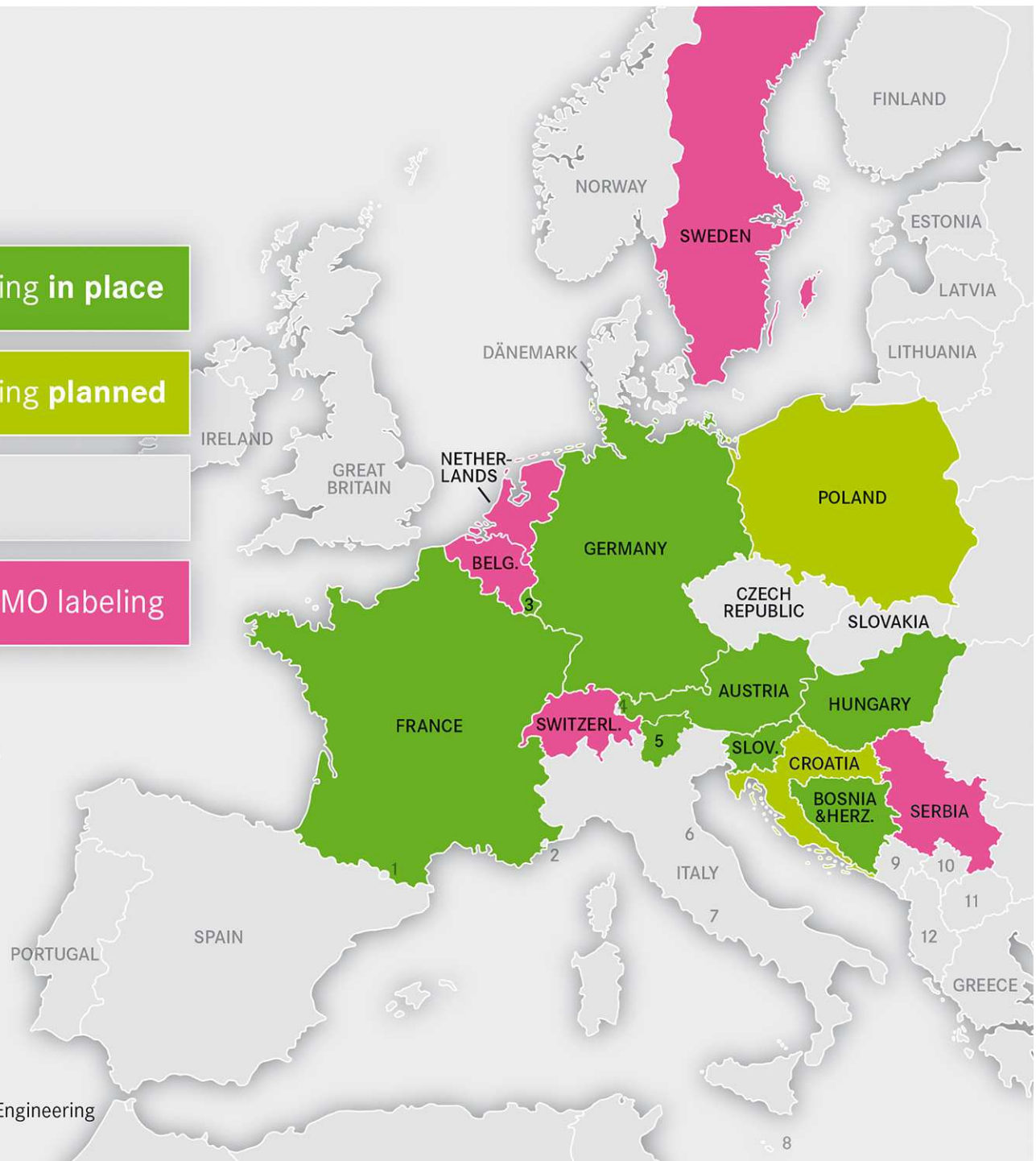
No regulations

Regulations **preventing** non-GMO labeling

- | | |
|-----------------|----------------|
| 1 ANDORRA | 7 VATICAN CITY |
| 2 MONACO | 8 MALTA |
| 3 LUXEMBOURG | 9 MONTENEGRO |
| 4 LIECHTENSTEIN | 10 KOSOVO |
| 5 SOUTH TYROL | 11 MACEDONIA |
| 6 SAN MARINO | 12 ALBANIA |



Survey by VLOG – status: 1 November 2017
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Clear Need for Harmonization!



We witness strong dynamics for non-GMO labelling in Europe:

- Currently seven EU countries & one non-EU country with **non-GMO regulations**:
 - D, A, F, Lux, S-Tyrol, H, Slo, BiH; also: USA
 - Several other countries working on non-GMO systems: P, Cro, B, Cz, I, Srb
 - Special situations in: CH, S
- But: **no uniform standard for non-GMO labeling & production**
- Pragmatic solutions for **mutual recognition of standards** between 2 countries and / or labeling systems
 - e.g.: ARGE Gentechnik-frei & VLOG
 - in case of imports from a country with a non-GMO standard into a country with a different standard: both standards have to be met (= the stricter sets the level)
- **„Vienna Declaration“ 2016:**
 - Appeal for a **common European approach on non-GMO labelling**, working towards equivalent standards for production, certification and labelling
 - **„Non-GMO Danube Region Standard“** defined as benchmark that could serve as model for harmonization (national guideline, private standard, national law)



Clear Need for Harmonization!



“Vienna Declaration“, 2016: A common European Approach requires:

- a common understanding of the key criteria for production, labelling and certification of GMO-free food and feed, establishing them as mutually agreed cornerstones for GMO-free labelling.
- national processes to work towards equivalent standards, with the short-term goal to devise procedures for mutual acceptance and recognition between existing national GMO-free labeling systems.
- high standards – with a balance between a reliable and scientifically valid system on the one hand, and practicality regarding implementation on the other hand.
- to be in line with the requirements of organic production with regard to the use of GMOs.
- to cover the complete food and feed chain, with clear regulations for production, certification and labelling.
- an increased and systematic information exchange between all relevant players in the field of GMO-free labelling.



Start for a New Umbrella Organization



Currently in the making: Foundation of a new European industry Association for the non-GMO food and feed sector

- Key Targets:
 - **unite the European non-GMO industry players:** retail, food & feed producers, agriculture
 - establish a **strong representation and lobbying platform** in Bruxelles, for all non-GMO issues
 - **transfer economic power into political power**
- Desired members:
 - **national associations** like VLOG, ARGE, FLOG
 - **transnational associations** like Danube Soy
 - **business players** active on a pan-European, transnational basis
- Initial tasks:
 - harmonization of non-GMO regulations
 - regulation of new GMO technologies as GMOs



Non-GMO – What are the benefits?



- Products that are **clearly desired by consumers AND retailers**
- Strong and credible feature of **special quality of products** – increasingly acknowledged and demanded on the European market
- Concrete and valid impulses for a **more sustainable food & feed production**:
 - non-GMO soya not only without GMO, but increasingly following additional sustainability criteria (→ significant part of non-GMO soya certified by ProTerra)
- Concrete and valid impulses for a **more local / regional protein supply**:
 - local / traditional protein sources such as lentils, sunflower, rapeseed etc.
 - Danube Soy & European Soy developing in the wake of non-GMO production
- Strengthening of **monitoring & certification** of food and feed production
 - significant increase of certification & monitoring throughout the full food production value chain
- Impulse for **synergies between different quality standards / certification systems**:
 - tendency towards stacked audits

Workshop

**Non-GMO labelling – a functioning
tool to keep agriculture GMO-free**

**Looking forward to
your questions!**

