



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

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Paola Testori – Coggi
Deputy Director General
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RE: The Novel Foods Regulation

Registered in Sweden,
Uppsala under organisation
number 817606-9436

Dear Mrs Testori-Coggi,

The IFOAM EU Group would like to comment on the Novel Foods Regulation, in particular with regard to nanotechnologies and cloning.

NANOTECHNOLOGY

The organic sector is concerned that the latest developments in nanotechnologies will lead to an insufficiently considered use of nano-particles (the product of the nanotechnologies) within the agri-food sector. Nano-particles are increasingly available and there is a serious lack of relevant toxicological studies addressing their impact on the environment and human health.

The IFOAM EU Group asks for more research for a better understanding, and a knowledge-based decision on the use of nanotechnologies in the agri-food sector. More research studies clarifying the toxicological, ecotoxicological and other consequences of nanotechnology are of a very high priority. The IFOAM EU Group asks that nano-particles undergo a separate evaluation from substances of normal particle size, covering all uses in farming and food production sectors (nano-particles as food and feed ingredient; as processing aids; in processing tools; as part of the food or feed packaging; as production inputs, e.g. fertilizers, plant protection substances, cleaners, etc.).

Organic production is strictly regulated in the EU (EC reg. 834/2007). Although the private organic sector is open to new technologies, organic production uses them only with precautions and if verified as low-risk and if in line with the principles of organic farming. In this regard we follow the issue of nanotechnology with high interest.

Nano-particles for the use in organic farming and food should be evaluated case-by-case, using the same criteria as in cases of other inputs for use in the organic sector¹ (after being separately evaluated as safe as mentioned in the paragraph above). However, as long as there are knowledge gaps, the concerns described above remain and authorization of nano-particle use in the organic sector is not possible.

The IFOAM EU Group calls for the declaration and labelling of nano-particle use. The identification of nano-particles at the level of operators and consumers is one important basis for an appropriate handling of nano-particles in the food chain.

This would be important information for consumers, and further, it would enable the organic sector to identify any use of nano-particles. In this way, the organic sector can choose to limit or even ban the use of nano-particles at any time (as some private standards are already doing).

CLONING

Techniques of animals cloning for food production are totally unacceptable and unnecessary within the EU agriculture sector. These technologies are highly controversial:

- Animals have rights as any living being. We need to respect them. There is scientific evidence that cloning causes pain and suffering to animals, and negative consequences to their health.
- Cloning will support industrialization of livestock production and this might lead to animal health and welfare problems as well environmental problems. Authorization of cloning for food production might worsen the animal welfare performance of European agriculture.
- Cloning is a threat to the genetic diversity of livestock and constrains possibilities for future livestock breeding, which might be the key for global food security.
- Cloning would make farmers dependent on patented technologies owned by big companies, putting food sovereignty under threat.
- EU citizens are clearly against any cloning technologies.
- The European Food Safety Authority (EFSA) recommends implementing further studies on the impact of cloning for livestock.

¹ These criteria are outlined in EC Regulation 834/2007



The IFOAM EU Group is against any use of meat from cloned animals and their offspring within the EU and therefore asks for a ban on the cloning of animals for food production and on the import and sale of imported food products from cloned animals and their offspring.

With kind regards,

A handwritten signature in black ink on a light-colored background. The signature is written in a cursive style and reads "Marco Schlüter".

Marco Schlüter
Director

Copy to DG Agriculture/DG Environment