



CPE

Coordination Paysanne Européenne  
European Farmers Coordination

To  
Stavros Dimas  
Commissioner for Environment  
European Commission  
Rue de la Loi 200  
1049 Brussels  
Belgium

14 May 2007

Dear Commissioner Dimas,

We write to you with regard to the "**online consultation on Community labelling thresholds for the adventitious or technically unavoidable presence of authorised genetically modified (GM) seeds in conventional seeds**", which has been launched on May 7<sup>th</sup> at

<http://ec.europa.eu/yourvoice/ipm/forms/dispatch?form=Seedlabel>

We are concerned about a new push to establish thresholds for the contamination of conventional and organic seeds with GMOs as we believe that any presence of GMOs in seed should be identified and labelled at the detection level.

This view is shared by more than 300 European organisations with a combined membership of around 25 million European citizens as well as more than 200.000 signers of the "Save our Seeds" Petition addressed to you. In addition, as you may be aware, a majority of member states Governments, Parliaments and competent authorities have taken a similar view, and so did the European Parliament, the European Economic and Social Committee and civil society organisations.

From our point of view the Austrian Seed purity regulation in force since 2002 should form the basis of further discussions on the implementation of stringent seed purity requirements.

As regards the online consultation we have the following procedural concerns:

1. The consultation is available on the Commission's website in English only and has not been publicly announced. The questionnaire is not even listed in EC consultations list:  
[http://ec.europa.eu/yourvoice/consultations/index\\_en.htm](http://ec.europa.eu/yourvoice/consultations/index_en.htm)
2. It contains alarmingly biased language, misleading and partially false information about the present legal situation, especially as regards labelling and the state of knowledge.
3. This "interactive policy making consultation" is designed as a multiple choice exercise, which in many cases does not even allow consultees to express full opposition to any GM seed contamination. It is also confusing in many respects.
4. Contributions are requested only until June 7<sup>th</sup>. After a long period of inactivity on this issue this seems to be an inappropriately short period of time.

We do not believe that such an exclusive and distorted web-based procedure is an appropriate way to respectfully and seriously approach European citizens, national and regional institutions and organisations on such a serious matter.

We therefore ask you

1. To present and explain to the public the underlying agenda and approach with respect to the planned establishment of labelling thresholds for GM contamination of seeds.
2. To establish a transparent and fully inclusive procedure to allow organisations and individuals to state their position on this issue in their own language, based upon proper information and in the format they choose. This should not be restricted to internet-based exercises and should also include a meeting of all stakeholders concerned.
3. To fully and correctly present the current legal situation, the state of scientific and practical knowledge and to abstain from suggestive and misleading language in the questionnaire.
4. To disclose and share your present state of information about GM contamination of seed in the Community, including the procedures and test results in the member states concerning the detection of both, unapproved and approved GM varieties in conventional and organic seed stocks.

We would be happy to directly discuss with you the design and concept of the consultation and would hope to achieve on a fully inclusive and meaningful procedure.

Sincerely



*Benedikt Haerlin,*

*on behalf of*

**SOS, Save Our Seeds**

*Marienstr.19-20, D-10117 Berlin, Tel +49 30 27590309*

**IFOAM, International Federation of Organic Agricultural Movements, Marco Schlüter**

*Rue du Commerce, 124-6 et., B-1000 Bruxelles, Tel 02 7352797*

**CPE, Coordination Paysanne Européenne, Gerard Choplin**

*Rue de la Sablonnière18, B-1000 Bruxelles, Tel 02 2300776*

**EFFAT, European Federation of Food, Agriculture and Tourism Trade Unions, Arnd Spahn**

*Rue du Fossé-aux-Loups, 38 box 3, B-1000 Bruxelles, Tel 02 2096265*

**FOE, Friends of the Earth Europe, Helen Holder**

*Rue Blanche 15, B-1050 Bruxelles, Tel 02 5420182*

**Greenpeace European Unit, Marco Contiero**

*Rue Belliard 199, B-1040 Bruxelles, Tel 02 2741906*

Copy to

Mogens Peter Carl

Ladislav Miko

Chantal Bruetschy