

## Statement delivered before the CODEX Committee on Food Labeling

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Consumers International urges the Committee to recommend the mandatory labelling of all Genetically Engineered Foods. There are three principal reasons why it should do so, but before I summarise these, I would observe that this Committee not only has the opportunity to ensure that full and proper information is given to consumers, but a mandate to provide leadership on this important issue. Why should comprehensive, mandatory labelling be required?

1. CONSUMERS HAVE A RIGHT TO KNOW what is in their food and how it has been produced. The fundamental rights of consumers to information and choice have been recognised around the world ever since President Kennedy drew attention to them in 1963 and they are enshrined in the UN Guidelines on Consumer Protection, adopted by the General Assembly in 1985. Applying these rights to Genetically Engineered Foods, we draw the Committee's attention to the fact that numerous surveys of public opinion worldwide have shown that consumers want them to be labelled. For some, there are health-related reasons for this. But many consumers have cultural, religious or ethical views on genetic engineering--by no means all hostile to the technology, particularly where it may alter flavour or storage life--and unless comprehensive labelling is adopted, they are prevented from exercising choice in relation to these fundamental values when buying food. We also note that the biggest barrier to the effective operation of competitive markets is lack of transparency; for this reason too, consumers need full information.

2. HEALTH PROTECTIONS. We all know that allergenicity is an important problem. The most effective method of prevention is to ensure that those who are at risk have the information to allow them to avoid foods which may affect them. In addition, unanticipated allergenicity or other health problems could be created by the new technology of genetic engineering and labelling is an important tool in allowing the rapid tracing and correction of such events. We welcome the confirmation by Professor Taylor yesterday morning that the list of allergenic foods is incomplete, covers a wide range of product types and that 'every protein is a potential allergen.' Since genetic modification generally involves the transfer of proteins, the case for compulsory labelling is surely overwhelming. Selective labelling will not do. We note that, in 1996, a Joint FAO/WHO Consultation concluded that reliable animal models do not exist for assessing the allergenicity of genetically engineered foods.

3. THERE IS NOT SOUND BASIS FOR A SELECTIVE LABELLING APPROACH. We are strongly opposed to limited labelling based on the concept of 'SUBSTANTIAL EQUIVALENCE.' This is an ill-defined idea which will inevitably require value judgements to be made; this in turn will lead to endless scientific and legal disputes, principally as a result of efforts to limit the information given to consumers. It is not

acceptable that the value judgements of Codex officials or of this meeting, or of a court or dispute resolution procedure should take precedence over the right of ordinary people to be properly informed and make their own choices based on their own values.

One of the ironies of the development of this issue is the contrast between the enthusiasm of food producers to claim that their biologically engineered products are different and unique when they seek to patent them and their similar enthusiasm for claiming that they are just the same as other foods when asked to label them.

The principle that process is a legitimate reason for labelling has already been accepted by this very Committee in relation to irradiation, halal, and organic foods. Where people want to buy genetically modified foods for the benefits claimed--and we believe that many will want to do so--or do not want to buy them for whatever reason, they must be given the information to allow them to make this choice.

## SUMMARY

Our views are set out in detail in the paper circulated to this meeting, but I will just repeat the recommendations:

--Allergenicity. In recognising the risks of known allergens, it must also be acknowledged that, as a result of the very process of genetic engineering, unknown and uncommon allergens may occur, thereby increasing the risk of further allergies and deeming labelling a necessity for all genetically engineered foods.

--Substantial equivalence cannot be used as a basis for labelling since it is an arbitrary concept and of no significance to consumers for the labelling of genetically engineered foods.

--Genetic engineering is recognized by consumers as the most fundamental of food processing and, like food irradiation, requires labelling to identify this process has taken place.

--Denial of the labelling of genetically engineered foods on the basis of lack of traceability and process control is not acceptable when this can be achieved and regulated by Codex for organic and halal food production processes.

--CCFL has a responsibility to address the issue of providing consumers with information on genetic engineering as a matter of urgency since these foods are already being traded internationally.

FINALLY, I want to draw the attention of the Committee to the strength of feeling on this issue. Consumers International itself is a worldwide organisation bringing together more than 230 organisations in more than 100 countries and counting their membership in tens of millions. On this issue there is wide agreement to the policies I have outlined among a broad range of other non-government organisations, each with its own constituency. Then there is the evidence of many consumer surveys. This is a fundamental issue of the role of and the importance you attach to civil society and the institutions which represent it. They are near-unanimous in their

views. This is confirmed and reinforced by developments in the United States, where today a major lawsuit will be launched against the US government by a broad coalition of public interest groups, including scientists, food professionals, and consumer groups. The purpose of this lawsuit is to force the US government to introduce mandatory labelling of genetically modified foods. The argument that ordinary people are not--or should not be--concerned about this issue is completely wrong.

Last night, Laurie Currie, speaking as our host at the splendid reception, said --and I quote--"Codex's business is making standards which meet consumers' expectations." Today you have an ideal opportunity to show your commitment to this principle. We urge the Committee to progress this item by requiring mandatory labelling for all foods produced through genetic engineering.

Thank you.

Last Updated on 6/2/98  
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