

European Seed Association



**Recent Debate in the European Parliament on the issue of
Thresholds for Adventitious Presence of GMOs in seed of
conventional plant varieties and respective Commission Working
Document on Amending the Seed Marketing Directives**

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Brussels, 14 November 2002

Madam Commissioner
Margot Wallstroem
European Commission
200, Rue de la Loi
1049 Brussels

Dear Madam Commissioner,

It was with great interest that ESA European Seed Association followed your exchange of views on the issue of adventitious presence of GMOs in conventional seed with Members of the European Parliament at its recent plenary debate in Strasburg.

Although the parliamentary question put forward by MEP Graefe zu Baringdorf obviously was rather designed to again make the Commission aware of the 'SOS Save our Seed' campaign and therefore clearly misjudged the relation between the different levels of competences and consequent decision making processes, it was with great interest that we noted your statement that

"...as for the scope of Directive 18/2001/EC, this clearly relates to cultivation of a GM seed product itself and not a conventional seed product containing traces of GM seeds..."

ESA therefore would like to again urge you as well as your colleagues and in particular Commissioner Byrne to reconsider the approach contained in the latest Working Document of the Commission on the revision of the Annexes of the Seed Marketing Directives in view of adventitious presence of GMOs in conventional seed lots.

According to the Commission's Working Document labelling for traces of GM seeds in conventional seed lots that exceed a threshold of e.g. 0.5% is prescribed if the GMO concerned has received authorisation for cultivation following Directive 2001/18/EC.

This however is inconsistent with the legal appreciation of the Commission, as you rightly informed the Parliament, that conventional seed containing traces of GM seeds does not fall within the scope of that Directive.

The European seed industry has consistently put forward its request for practical solutions that take into consideration the development of GM production all over the world.

The current proposals to amend the Seed Marketing Directives concern only the labelling of the adventitious presence of a limited number of GM events authorised for cultivation in the EU.

Yet we face legal uncertainty for all other events (some of which are not yet authorised; some of which are authorised for deliberate release for experimental purposes; some of which are authorised for import and some/or all may not be intended for marketing in the EU), but all of which are technically unavoidable at trace levels in conventional seeds.

Your recent intervention in the European Parliament will certainly help the industry to resolve some of the confusion that exists, provided it is reflected in the text of the forthcoming proposals to amend the Seed Marketing Directives.

Thanking you in advance, we remain at your disposal for any further information or clarification at all times,

Yours sincerely,

Joachim Winter
Secretary General

Cc: Commissioners Busquin, Byrne, Fischler, Lamy, Liikanen
A. Checchi-Lang, G. Del Bino, M. Valvassori, Mrs D. André-Schoboboda; DG SANCO