Summary of responses to interested parties letter on European Commission proposal to allow member states to restrict or ban the use of authorised genetically modified (GM) food and feed products

Earlier this year the European Commission published a proposal that would allow Member States (MS) to restrict or ban the use of EU authorised GM food and feed in their territory. The proposal was prompted by a Commission review of the EU decision-making process, which concluded that Regulation (EC) No.1829/2003 should be amended to enable MS to restrict or ban the use of approved GM products if such measures are reasoned and based on compelling non-safety grounds under Union law. Such grounds could be:

- The derogations provided by Article 36 of the Treaty on the Functioning of the European Union (TFEU)[1] or
- For reasons of public interest as developed under European Court of Justice case law.

MS would need to demonstrate that any such measures are non-discriminatory, and comply with the principles of proportionality and subsidiarity.

All GM food and feed products marketed in the EU must pass a robust independent safety assessment by the European Food Safety Authority. This part of the EU system would remain unchanged by the Commission's proposal.

A copy of the Commission's review and proposal are available at: http://ow.ly/PQ9ru

As the UK competent authority for the operation of Regulation (EC) No. 1829/2003 on GM food and feed, the Food Standards Agency (FSA) published a letter on its website addressed to interested parties. In it the FSA sought responses to the following questions (with supporting data) and invited any other comments that interested parties might wish to make in relation to the proposal:

1. In what ways will different industry sectors be affected by this proposal?
2. What is the current price per ton of the different types of GM feed and non GM feed?
3. Do you foresee any additional costs or benefits (e.g. relabelling, transport, greater separation of GM/non-GM, disposal etc.) that may arise from this proposal?
4. Do you foresee any risks or uncertainties in relation to this proposal?

[1] A consolidated version of the TFEU is available at http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:12012E/TXT&from=EN.

5. To what extent are there substitutes available for GM feed? What are the barriers to their successful use?

Similar letters were directed to interested parties in the devolved administrations of Wales, Scotland and Northern Ireland.

The FSA is grateful to all those stakeholders who took the time to respond to our consultation. All responses received will help us prepare for future discussions with the Commission and other MS. We are aware that some stakeholders have published their responses to the FSA in full on their own respective websites. The table below sets out a broad summary of the responses received.

Summary of Responses

A total of eighteen responses were received to the consultation.

Of the total, twelve responses were from organisations representing the Agri-food chain; two responses were from Environmental Non-Governmental Organisations (NGOs); three responses were from members of the public; and one was received from a national academy of science.

The responses received from the Agri food chain and Environmental NGOs were broadly opposed to the proposal although for differing reasons. Whilst members of the public expressed unease with GM technology and in particular the safety of GM products.

BROAD SUMMARY OF SUBSTANTIVE COMMENTS TO FSA CONSULTATION ON THE EUROPEAN COMMISSION PROPOSAL TO ALLOW MEMBER STATES TO RESTRICT OR BAN THE USE OF AUTHORISED GENETICALLY MODIFIED (GM) FOOD AND FEED PRODUCTS

Question 1: In what ways will different industry sectors be affected by this proposal?

Respondent	Method of Response	Comment
National Farmers Union Scotland	Email	Feed is the biggest cost faced by pig, poultry and dairy industries. Bans on GMO product in Scotland would trigger increases in cost and would be very damaging for many sections of our industry. It would be presumptuous to assume that Scotland would draw a marketing advantage from non-GM food or feed status – that is already available via the organic market which could itself be damaged if one of its unique selling points, its non-GM status, applied to conventional production as well.
Shepton Farms	Email	Conventional and organic sectors will be affected - for organic farmers there will be no benefits as we are not users of GM crops therefore it's about enhanced authenticity and integrity.
Coceral, Fediol & Fefac	Email	The adoption of the proposal will place the livestock industry at a significant competitive disadvantage vis-à-vis its competitors in non-opting out Members States and third countries, as it will be required to pay high costs for non-GM soybean meal or alternatives. There will be limited ability to absorb higher prices for compound feed.

		Any shift to producing more domestically grown proteins and oilseeds would likely result in the EU losing its status as one of the world's most reliable exporter of high quality grains. Consequences for the European oilseed crushing industry would be detrimental. If industries relocate away from opting out countries this will result in a decrease in demand for rapeseed meal and sunflower seed meal in the opting out countries. This reduction would result in lower income and employment generation in the livestock sector; while EU produced oilseeds will be crushed outside the EU (thereby losing the added value derived from crushing in the EU).
Agricultural Industries Confederation	Email	The scale of the impact on the livestock industry will be determined in part by the action taken by individual Member States. Industry will either need to source the same feed materials from non-GM sources (with the consequent price implications), or to reformulate diets to deliver the same nutritional performance – again at a higher cost level. The overall size of the import market for GM feed materials will diminish if some Member States prohibit their use. As a commodity sector the reduced volume may have a knock-on effect by increasing the relative price per tonne. The level of risk will also increase for the sector in terms of looking to import alternative or non-GM feed materials because of the challenges of third country segregation and of sampling and testing inaccuracies. Similar issues will be faced by the feed manufacturing sector. In the UK, at retail level there is a greater sensitivity to price and availability, possibly more than there is to the presence or absence of GM. This has applied in both the food and feed markets. The impact of the proposal to the UK farm sector will be determined by the impact on their

		ability to compete on price with third country supplies, particularly in the white meat sector.
National Farmers Unions of Cymru & England	Email	Feed is a major proportion of farm production costs. Pig and poultry sectors are especially vulnerable, where feed is 55-65% of cost of production. Any disruption in supply of imported protein crop products would have a significant impact on British livestock production. Increases in the price of feed would put significant strain on food producers and risk making the EU uncompetitive. Any gap in domestic supply of products of animal origin would be filled by imports from animals fed GM rations. If bans were adopted bilateral agreements would be needed. This would be disruptive, complex and damaging to the single market, as well as have wider implications for competitiveness and the trade deficit. International trade agreements would certainly suffer under the proposal.
Northern Ireland Grain Trade Association	Email	Northern Ireland imports over 90% of the feed materials it consumes and is totally reliant on the global grain market. Two million tonnes of feed materials enter the province each year and much of this material is derived from genetically modified crops. Regions which reject GM imports will be unable to sustain intensive livestock production and will face food shortages and inflated food prices.
British Association of Feed Supplement and Additive Manufacturers	Email	We oppose the proposal as it has the potential to create trade barriers between Member States, based on political rather than safety concerns. As many companies in this industry sector operate on a pan-European (or global) basis, this is totally unacceptable.

National Pig Association	Email	The European pig sector is particularly vulnerable to any forthcoming proposals as feed equates to approximately 65% of the cost of producing a pig and critically the EU imports 90% of its protein requirement i.e. soya. Any financial instability in an already extremely volatile market will negatively impact pig producers and their businesses. If UK pig production ceases to be economically viable, the entire industry will collapse and pig meat will be imported from third countries.
Food and Drink Federation	Email	There is a potential impact on animal production and the pet food sectors if GM animal feed is no longer allowed in a particular territory. Farmers may have to rely on protein sources that are not as beneficial for their animals, putting animal welfare at risk as well as productivity. The dairy sector could be affected by increased costs of using non-GM feed, which in turn would affect the price of raw materials going into a wide range of food products e.g. whey, lactose, casein, baby foods, foods for special medical purposes, and sports foods, etc.
Dairy UK	Email	The UK dairy industry is heavily dependent on imported GM soya as a source of high quality protein. Approximately 70% of animal feed entering the UK is believed to be GM. Significant volumes are used by dairy farmers.
Pet Food Manufacturers Association	Email	We believe the proposal would have a negative, unnecessary, burdensome effect on the pet food industry for numerous reasons: • disruption of the single market; • restrictions or banning the use of safe GMOs could unnecessarily public concern despite them being unfounded;

		• a reduction in available feed would lead to less by-products for use in pet food; • 100% segregation of GM and non-GM materials is already difficult; and • it would lead to increased ingredient, production and marketing costs for the manufacturer and subsequently the end consumer.
The Grain and Feed Trade Association	Email	UK trade will be adversely affected in many ways. Additional shipping costs if designated transport is required, separate storage and silos etc. The extra costs associated with the lack of non-GM supply to the UK would lead to closure of livestock holdings and impact severely on meat sectors should the UK regions opt out.

Question 2: What is the current price per ton of the different types of GM feed and non GM feed?

Respondent	**Method of Response**	**Comment**
National Farmers Union Scotland	Email	The current price differential between GM and non-GM feed is around 30%. A move to non-GM feed for pig production would lead to an estimated increase of £20 per tonne in the cost of feed – costing an additional £7 per pig. In poultry such a move would increase costs by 2p per kilo of chicken and 4p per dozen eggs.
Food and Water Europe	Email	Increased demand for non-GM would lead to increases in supply and consequently result in lower costs.

		Feed costs remain high even as the GM industry trumpets cultivation; consumer costs for food continue to rise even when feed costs ease or amid record harvests; and, farmers continue to struggle with profitability amid rising global demand and record high prices.
Coceral, Fediol & Fefac	Email	The price premium for Identity Preserved non-GM soybean is highly volatile. In 2015, the average premium has been around 80 Euros per tonne and in 2014 it peaked at 200 Euros per tonne.
Agricultural Industries Confederation	Email	The current price premium for non-GM soya is approximately 100 Euros per tonne (but in recent times has been in the range of 85-200 Euros per tonne). Non-GM maize by-products are not generally available in the market.
National Farmers Unions of Cymru & England	Email	We understand that for soya as a feed ingredient the differential has moved during this year between £80 per tonne and £132 per tonne.
National Pig Association	Email	Non-GM soya attracts a £132 per tonne differential vs GM soya. The current premium would increase due to the extremely limited volumes available and potential massive demand, thereby exacerbating an already very volatile commodity.
Food and Drink Federation	Email	The Commission's own communication 22.4.2015 – COM (2015) 176 final suggests that a price premium of around 40 Euros per tonne is paid for long-term contractual agreements, rising to up to 100 Euros per tonne on the spot market for non-GM feed. However, this could rise if a number of

		Member States use opt-outs as the market is not infinitely or rapidly expandable.
Dairy UK	Email	Data on feed prices is collected and published by AHDB Dairy (see http://dairy.ahdb.org.uk/market-information/farm-expenses/feed-prices/uk-feed-prices/
The Grain and Feed Trade Association	Email	In the UK, non GM soy is trading at a premium of +/- £100/t, based on today's market situation which is tight and any volatility would have a significant impact. For every increase of £100/t, it is estimated that there will be a £20 increase in costs for poultry farmers, £10 pigs, and £5-6 for beef which would be catastrophic for UK farmers.

Question 3: Do you foresee any additional costs or benefits (e.g. relabelling, transport, greater separation of GM/non-GM, disposal etc.) that may arise from this proposal?

Respondent	**Method of Response**	**Comment**
National Farmers Union Scotland	Email	Currently the UK grain market is treated as a single entity. Any bans in the constituent parts of the UK would impose the need to verify the non-GM status of grain moving between those countries. In the event of a UK ban all imports would need to be tested to ensure banned material was not present. It is not clear what threshold for accidental presence may be if bans are brought in. The threshold level

		would influence how many shiploads were rejected. Importers would need to consider how to recover the costs of those risks which partly would be passed to UK consumers. If all imported material were non-GM then storage and distribution costs post import would not necessarily increase. It could be argued that removing segregation of GM and non-GM would save cost.
Shepton Farms	Email	All of these will result in additional costs. The burden of costs incurred for verification should fall to GM farmers, producers and processors.
Food and Water Europe	Email	If the UK bans GM imports, the additional costs within the UK of segregation, currently borne by non-GM producers would evaporate. Further additional costs like non-GM labels would also be removed as a non-GM status would become a celebrated part of the UK food brand.
Coceral, Fediol & Fefac	Email	The need for dedicated silos, rinsing, cleaning, analysis and administrative costs for compound feed producers add 30 Euros per tonne to the trade-related non-GM premium. The foreseeable increase in demand for non-GM soybean meal under a possible opt-out scenario would lead to higher premiums and costs. Unless non-GM soybeans are shipped directly to a crushing plant, they are typically stored in dedicated silos that need to be thoroughly cleaned. As will the trucks in which soybeans are transported. The crushing plant has to be cleaned, as well as the storage facilities, which inevitably adds costs and time to the process. The risk of commingling is so high for the first non-GM soybeans that are

		crushed, that they are normally sold as GM. It is only after several hours (or an entire day), that those soybeans may be safely used as non-GM. Even if cleaning and separation protocols are rigorously observed, the risk of commingling cannot always be entirely overcome. Segregation and associated costs will eventually pose a tremendous financial burden on the opting out countries' livestock sector.
Agricultural Industries Confederation	Email	Opt-outs make the EU a less attractive, and therefore more costly, market to service. Increased costs for sampling, separate storage and transport requirements, extra costs at feed mills for separation, flushing between batches and associated loss of production time. The level of cost involved is impossible to determine at this stage as it is unclear how many Member States will use opt-outs. The current level of premium required by the sellers of non-GM material in the soya market gives some indication of the scale of likely costs involved. The other potential area of additional cost is in relation to the movement of finished goods e.g. compound animal feeds, within the EU. E.g. should an English compounder supply to Germany, and Germany uses opt-outs then the ability to retain that export market would come at the cost of having to source different raw materials.
National Farmers Unions of Cymru & England	Email	All measures required along the supply chain to ensure separation, testing and labelling of product for different markets have a cost attached. Such costs are commonly passed down to primary producers, and there is a legitimate question to consider about who should be paying for or absorbing these costs within the supply chain.

GM Freeze	Email	More effective segregation of GM and non-GM animal feed would bring a significant benefit to consumers and to the farmers, manufacturers and retailers who want to give their customers real choice. Consumers expect industry to bear any costs of labelling or segregation. Such costs must shift towards the producers and traders of GM crops and away from those seeking to maintain a GM-free supply line.
National Pig Association	Email	Segregation, labelling and enforcement protocols and the associated challenges to the supply chain will all add cost, which will invariably be passed down the supply chain to primary producers.
Food and Drink Federation	Email	Considering that 100% segregation in supply chains is not achievable there will be an increased burden to maintain separate streams of GM and non-GM products. Segregation measures, labelling and increased traceability will generate significant additional costs.
Dairy UK	Email	For any ban to be enforceable feed traceability systems would have to be subject to even greater scrutiny by authorities to achieve compliance at an unknown cost to government and the industry.
Pet Food Manufacturers Association	Email	The proposal would lead to increased costs associated with segregation throughout harvesting, storage, transport, and in production lines. Increased costs would also arise through greater labelling, traceability, product testing and additional training.

The Grain and Feed Trade Association	Email	Opt-outs will lead to increased costs and administrative burdens on shippers, disrupt established trade flows, and remove economies of scale for bulk consignments. Greater segregation in silos, vessels and transportation would increase costs. The installations are not available to produce separate feed per region across the UK.

Question 4: Do you foresee any risks or uncertainties in relation to this proposal?

Respondent	Method of Response	Comment
National Farmers Union Scotland	Email	The proposal would cause serious distortion of competition for all EU livestock production and threaten the internal market for food and feed. Re-nationalising decision making on GMOs and allowing countries to ban use of approved GMO products on non-safety reasons sets a dangerous precedent which undermines the core principle of harmonised policies across the EU.
Shepton Farms	Email	The potential impact that introducing GM crops will have on consumers is unknown.
Food and Water Europe	Email	The proposal is a difficult mechanism to use for opt-outs. The Commission should deliver on assurances to rectify the democratic deficit in the GM authorisation process. The law permits the Commission to act as it sees fit

		on GM dossiers – it does not compel the Commission to approve GM dossiers that do not achieve a qualified majority. EU level discussions have highlighted a wide range of serious problems. The definition of 'use' is unclear, leaving Member States with little assurance of legal certainty if they attempt to opt-out. There are complications in operating a patchwork of food /feed opt-outs in the Single Market…particularly noting the interrelated nature of many European businesses, including transhipment between Member States of ingredients at multiple stages of food production. Compatibility with international trade rules, including those currently being negotiated with the US adds another layer of complexity. It is difficult to see how the proposal can work better other than with a clear EU wide ban.
Coceral, Fediol & Fefac	Email	From a legal perspective, the potential national restrictions adopted under the proposal may be challenged by relevant EU trading partners (such as Argentina, Brazil and the USA) before the World Trade Organization on grounds that they are inconsistent with the EU's international trade commitments. Opt-outs also cast doubts on the proposal's compatibility with the EU's domestic principles; this would create obstacles in the internal market that may not be justifiable under the Treaty on the Functioning of the European Union (TFEU).
Agricultural Industries Confederation	Email	The disruption and additional costs associated with asynchronous approvals are indicative of the types of risks associated with the current proposal. The creation of internal market differences and the ongoing problems related to sampling and testing accuracy threaten to add further

		cost and delay both in terms of the import of feed materials into the EU and the subsequent transfer of finished feeds across internal borders. Opt-outs by the devolved administrations could cause major disruption to production and distribution logistics for the animal feed industry. In effect trade barriers could be established between the four countries of the UK.
National Farmers Unions of Cymru & England	Email	A major risk related to the proposal is the negative impact on the Single Market for food and feed. Movement of feed commodities and animal products between EU countries is a vital trade flow that would be hindered if Member States use opt-outs. The legal uncertainty around the definition of 'use' is unhelpful. There are significant traceability implications and uncertainties given the movement of animals and animal food products across the EU.
GM Freeze	Email	We are very concerned about the severely restricted range of justifications that the proposal offers for Member States wishing to ban GM food and feed imports. Similarly, the requirement to respect internal market rules and WTO trade obligations may make the entire proposal unworkable. We also have significant concerns about how any such bans can be truly enforced.
National Pig Association	Email	The majority of British cull sow meat is exported to Germany for further processing and consumption due to demand. If, however, Germany was to use opt-outs, the UK could potentially lose its entire cull sow export market, which would severely erode pig producers' profitability and productivity due to the sudden reduction in replacement rates. For

		example UK carcass exports (predominantly sow carcasses to Germany) totalled £37 million in 2014. There is also currently no viable alternative market for sow meat.
Food and Drink Federation	Email	We believe that, in the context of GMOs, factors such as consumers' values and ethics are already covered in European legislation, which requires any presence of authorised GMOs to be labelled, thereby enabling consumers to make informed choices. The proposal goes against the principle of basing legislation on science. The free movement of food and feed throughout the Single Market can only be achieved by uniform implementation of EU legislative requirements.
Dairy UK	Email	The proposal would affect the operation of the EU single market and policy on food and feed move further away from science based decision taking.
The Grain and Feed Trade Association	Email	The proposal will be unworkable and the lack of an impact assessment at EU level with no evaluation of potential consequences are a serious concern to industry, together with idea that controls may be reintroduced at borders at GM opt out countries or regions.

Question 5: To what extent are there substitutes available for GM feed? What are the barriers to their successful use?

Respondent	Method of Response	Comment
National Farmers Union Scotland	Email	Supplies of non-GM feed are limited. Most countries producing large amounts of protein crops are increasingly planting GMO, with no indication that they are reversing that trend. The EU is a relatively small market for protein crops and is not a sufficiently powerful buyer to drive major producers away from GM. For Scotland, we remain entirely dependent on imported protein, notably soya, with limited options for growing our own protein crops. There are no realistic alternatives – especially since the ban on processed animal proteins – either in terms of nutritional composition, price or availability. Major UK supermarkets had a moratorium on the use of GM feed in chicken and egg production. During 2010 – 2013 they each relaxed this policy because of the difficulties in ensuring sufficient segregation of GM and non-GM material.
Shepton Farms	Email	It is a misconception to believe there isn't enough non-GM feed available. Countries such as Brazil have poor segregation procedures thereby mixing GM and non GM crops. Segregation procedures can be instilled with the right commercial pressure and demand.

Food and Water Europe	Email	Brazil produces a good deal of non-GM soya but farmers do not always go to the expense of having it certified as non-GM. This non-GM content is probably included in GM import figures via comingled shipments because of EU labelling requirements. Non-GM production can be expanded to meet increased demand. Non-GM soya is also produced in the EU. Meanwhile research alternatives to industrial monoculture soya and maize. Research is being carried out by Aberystwyth University and the John Innes Centre. Investment in such research is needed.
Coceral, Fediol & Fefac	Email	Soybean meal is the most cost effective and nutritionally balanced source of protein available and therefore the preferred protein source for animal nutrition because of its high concentration of proteins (up to 48%), high essential amino acid content (lysine), high digestibility and low fibre content. Offsetting lower digestible protein content by feeding higher amounts of alternative feedstuffs is not possible without impairing livestock performance and the economic viability of livestock holdings, since animal feed intake per day is limited and modern animal nutrition is based on the "least-cost" formulation of feedstuffs. Animal protein sources with similar protein content are either banned in the EU for feeding purposes, available in too small quantities or are too highly priced (e.g. fishmeal, due to limited global availability). Substitution of soybean meal by other vegetable protein sources is significantly less feasible in the poultry sector than in the pig sector. In 2009 a temporary ban on imports of soybean and soymeal lead to use

		of sunflower seeds and wheat bran (plus enzymes) as feed ingredients. This temporary switch cost the Turkish and poultry egg sectors approx. $103 million in terms of additional feed required and loss of production.
Agricultural Industries Confederation	Email	The UK uses about 7% of the soya imported to Europe. The use of soybean meal in the UK is estimated at around 2.2 million tonnes of which only a very small proportion is currently non-GM. Suitable alternatives do not exist for many diets within the monogastric sector, particularly poultry. Any alternative feed materials would deliver lower performance in terms of poorer growth levels, thereby making the process uncompetitive with producers outside the EU. At present non-GM soya is still available (at a premium) but if demand increased significantly this may not remain the case. EU produced Danube soya is non-GM but the quantity produced is small (circa 1.5 million tonnes) compared to EU demand of about 35 million tonnes. As most diet formulations are designed to deliver specific nutritional requirements, any attempt to maintain the overall cost of the ration using alternative feed materials would be to the detriment of the producer and the livestock concerned. Soya usage in pig diets is now close to a level below which it would be difficult to further reduce for the nutritional reasons.
National Farmers Unions of Cymru & England	Email	There are differing requirements for ruminants, pigs and poultry, and suitability of rations depends on nutrient balance, any anti-nutritional component, structure and palatability. There are currently legal barriers to the use of processed animal protein and food waste. Insect-derived protein may become available in the future but we understand there is a 5

		to 10 year lag before this occurs.
Northern Ireland Grain Trade Association	Email	Only around 2 M tonnes of soybean can be classified as non-GM (less than 1% of global production) This involves segregation of the crop at harvest and Identity Preservation throughout the supply chain.
GM Freeze	Email	The EU's dependency on overseas supply of animal feed is a very significant risk to the UK farming industry. Many of our members are actively involved in work improve the EU's own production of animal feed and some also campaign for a reduction in the consumption of animal products.
National Pig Association	Email	There are a variety of substitutes available for use as pig feed such as lupins, peas and beans, sunflowers, processed animal protein, rapeseed meal, insects and food waste. However, many are not viable alternatives as they are not grown and therefore unavailable; their use is limited because of anti-nutritive factors; or there are legal barriers to their use.
Food and Drink Federation	Email	With the exception of on-going research and discussion on insects as possible feed protein sources, we are not aware of alternatives for GM feed. The legal status of insect protein is not yet determined and as such could be a barrier to the successful use of insect proteins as feed. Other protein rich sources such as corn gluten meal or cottonseed are also from GM crops so subject to the same issues as soy. Protein sources such as poultry meal are not a blanket replacement due to prohibitions on intra species recycling.

Dairy UK	Email	Existing substitute products are not as cost effective as soya protein. Any evaluation of substitutes would also have to take into account the competitive disadvantage UK dairy farmers would be subject to if they were subject to a ban whilst their EU counterparts were not.
The Grain and Feed Trade Association	Email	The volumes of proteins required for import into the UK are neither available nor replaceable by other substitutes such as pulses, insects, and rapeseed. Furthermore, substitution is not always possible in all animal species considering the nutritional and technical values as poultry diets require soybean meal.

Additional Comments

Respondent	**Method of Response**	**Comment**
National Farmers Union Scotland	Email	Consumers have already shown through their buying preferences that they are generally undisturbed by the use of GM feed for animals used to produce beef, lamb, pork and milk products. GM yeast is used to produce wines, beers, and cheese. Scottish Distillers of gin and vodka use large volumes of maize or products produced from maize. Whilst they all specify non GM maize – this is becoming an ever scarcer commodity. Any disruption of supplies of maize in the EU could affect the availability and price of GM and non GM maize.

Member of Public	Email	We definitely don't want or need GM foods in any form in the British Isles or the EU – or fed to livestock or pets. These are chemically contaminated foods that can and do affect the wellbeing of human and animal health. If agriculture is carried out responsibly there is food for all.
Shepton Farms	Email	Feeding trials should be undertaken for longer periods. The commonly perceived modus operandi of glyphosate, the most commonly used chemical to take advantage of GM manipulated crop, is wrong. Investment in conventional plant breeding to deliver yield boosts should be continued rather than being diverted into GM projects.
Member of Public	Email	There has never been sufficient independent peer reviewed research into the safety of these products. There was no scientific baseline study carried out prior to the introduction of GM crops into the USA – therefore it is not possible to accurately substantiate claims that there is no evidence of harm as a result of consuming GM foods.
Member of Public	Email	There is no evidence to demonstrate that GM foods or produce derived from GM fed animals is safe for humans to eat. No long term studies have been done. GM and non-GM cannot co-exist, GM contamination of conventional and organic food is increasing, and consumers want GM free food.
Food and Water Europe	Email	The UK should not wait to rely on a flawed Commission proposal but rather it should alter its position at EU level, encourage non-GM

		production and facilitate a move away from GM commodities as a priority.
Northern Ireland Grain Trade Association	Email	Interest in non-GM food has declined as retailers perceive that non-GM requirement adds cost without adding any value. Given that market solutions already exist and non-GM foods can be supplied where necessary the proposed regulation is both unnecessary and damaging.
British Association of Feed Supplement and Additive Manufacturers	Email	Feed additives produced with GMOs in containment are out of scope of this proposal. Only a limited number of feed additives would be in scope, namely: • Those consisting of GMOs in their own right e.g. Tocopherols extracted from GM soya, betaine extracted from GM sugar-beet. • Additive preparations containing formulation ingredients which might be derived from GMOs.
GM Freeze	Email	Consumer demand has a huge influence on wholesale prices and the invisibility of GM animal feed in finished food products it goes to produce (meat, eggs, dairy products) means that consumers are currently prevented from exercising choice in this area. Consumers want to see less GM cultivation, and want to exercise their right to choose through labelling of GM-fed meat, eggs and dairy products.
The Royal Society	Email	We are concerned that if the rationale for such bans is not clearly communicated, it may cast doubt on the independent safety assessment conducted by the European Food Safety Authority. It is important that the public have confidence in the regulatory processes in place to protect their safety.

		The science around the production of GM food and feed needs to be better communicated so that people are able to feel informed. The 2014 *Public Attitudes to Science* survey found that eight-in-ten people feel that no food producing techniques and technologies that might raise world food production should be rejected out of hand.
Pet Food Manufacturers Association	Email	The proposal highlights the need for more work on improving consumer perception of GM technology and GMOs.