

The background of the entire page is a repeating pattern of small, light green icons representing various food items. These icons include fruits like apples, grapes, and strawberries; vegetables like carrots, peas, and mushrooms; meats like chickens, cows, and fish; and other food items like bread, cheese, and eggs. The icons are arranged in a grid-like fashion across the entire green background.

# Keeping GMOs out of Food

Final Report of the project

2014 – August 2018

October 2018

## 1. Introduction

Organic agriculture is by definition free from genetically modified organisms (GMOs) (Regulation 834/2007). But the ability of the organic sector to produce and supply high quality food, cosmetics and textile at a decent cost has been under threat from the risk of contamination by GMOs, reinforced by the development of new genetic engineering techniques which remain largely unregulated in most regions of the world.

That is why IFOAM EU decided to dedicate a specific project on GMOs: “Keeping GMOs out of Food” started in 2014 and ended in August 2018. This project was developed with the intent of identifying the socio-economic challenges for GMO-free food production in the EU, delivering practical guidance for practitioners on how to avoid contaminations, and advocating for policy frameworks that ensure rights to GMO-free producers.

The project has allowed IFOAM EU to keep the European organic sector mobilized on the issue of GMOs and to maintain a high profile on the issue in the policy discussions. The project was reviewed in 2016 to include the emerging issue of new genetic engineering techniques, the regulation of which is a high stake for the organic sector. The project had also assessed the feasibility of a database of contamination cases, which appeared difficult to do because of the reluctance of existing databases and companies to share data of this sensitive topic.

This report presents the main achievements of the project “Keeping GMOs out of Food” and introduces the new project “Keeping GMOs out of Organics”.



Workshop and Roundtable in Bingenheim July 2017  
Credit: Christoph Bollessen - Bingenheimer Saatgut

## 2. Project Overview

Between 2014 and 2018, different activities were conducted in the project Keeping GMOs out of food, in order to help the organic sector to remain GMO free. All activities and their main results are presented below:

### 1. Socio-economic Impacts of GMOs on European Agriculture

- ✓ Main Target: Policy-makers
- ✓ Main objective: To demonstrate the socio-economic impacts of GMOs cultivation on organic food and farming, and to use the main conclusions in advocacy work.
- ✓ The study '[Socio economic impacts of GMOs on European agriculture](#)', in partnership with FiBL, was published in 2017.
- ✓ Main conclusions: The study concludes that coexistence in breeding and seed production is unfeasible. The highest costs related to coexistence are testing and certification costs. Moreover, the study brings to light the unbearable situation of the organic sector when risks of contamination are too high: operators are obliged to adapt their production and to abandon certain types of productions. Such a situation is unacceptable: the organic sector should not bear the costs related to biotechnologies and should be free to produce without GMOs.
- ✓ Results: The conclusions of this study have been used in IFOAM EU's advocacy work towards the European Commission and MEPs to highlight the importance of national legislation on "coexistence" and of the polluter pays principle. It was also used to justify bans on the cultivation of GMOs, which are the most efficient way to protect organic producers from contamination.  
The results were communicated to IFOAM EU's members and through the newsletter. The study was also presented in [Biofach 2018](#).

### 2. Provide sector with practical recommendations to avoid GMOs contamination

- ✓ Main targets: the organic sector and the conventional GMO-free sector
- ✓ Key activities:
  - Roundtable (27/10/15): Current challenges for organic and non-GM sectors on the prevention of GMO contamination
  - Roundtable on seed contaminations (07/17)
  - Guidelines on how to avoid GM contamination (to be published in December 2018)
- ✓ Conclusions: The need for practical guidelines was highlighted in the roundtable discussion. The first part of the practical recommendations on how to avoid GMO contamination (recommendations for food and feed processors) was published for IFOAM EU's members on its extranet in 2017.
- ✓ The final document, which also includes recommendations for farmers, will be published by the end of 2018. The study will be launched at Biofach 2019 and will be communicated amongst IFOAM EU's members and stakeholders

### 3. Developing awareness on GMO contamination existing tools and strategies

- ✓ Main targets: the organic sector and the conventional GMO-free sector
- ✓ Key activities: Study [“Preventing GMO contamination – an overview of National “Co-existence” measures in the EU”](#), December 2015.  
Roundtable on seeds contamination (07/07/17): discussion on the different situation in each Member States and discussion about the opportunity to harmonize the implementation of the ‘0 tolerance’ policy on seeds.  
Discussions on a draft position paper on how to implement the ‘zero tolerance’ policy on seeds contamination.
- ✓ Recommendations: Ban on GMO cultivation is the most efficient and least expensive way to protect organic and conventional farming from contamination. National and regional authorities should help GMO-free food and feed sectors access GMO-free supply from Europe or abroad.  
In countries where GMO cultivation is not forbidden, governments should adopt measures to protect organic and conventional farming from contamination. Those measures should address the following aspects: GMO-free zones, transparency and information, mandatory notification, mandatory training, technical segregation measures, liability and compensation.
- ✓ Results: Recommendations were communicated to stakeholders and were used in IFOAM EU’s advocacy work:
  - ✓ Campaign not to authorize new GMOs for cultivation ([2016](#), [2017](#))
  - ✓ Modification of the GMOs regulation (Directive 2001/18) to enable Member States to opt-out GMO cultivation on their territory (Directive 2015/412) ([2014](#), [2014](#)).
  - ✓ Implementation by Member States of Directive 2015/412: 17 EU Countries and 4 regions opted out GM cultivation on their territory.

### 4. Provide information on new genetic engineering techniques and develop strategies

- ✓ Main targets: Organic sector, Conventional GMO-free sector and policy-makers
- ✓ Key activities:
  1. Follow the European agenda and discussions in coordination with national and European organization following closely the topic
    - ✓ Regular phone call meetings and physical meeting (8 November 2016, 11 July 2018) with organizations involved on the topic to exchange information and strategies and consider common advocacy work.
  2. Raise awareness of IFOAM EU members
    - ✓ Organization of an internal debate (30/11/16)
    - ✓ Organization of workshops (06/07/17) and regular meetings to discuss strategy with IFOAM EU’s members and NGOs partners.
    - ✓ Webinar argumentation training on new GM techniques co organized with Friend of the Earth Europe (26/06/17).

- ✓ Information of our members via the newsletter (ex. [political hotspot March 2018](#), [political hotspot September 2018](#)) and social media.
- 3. Advocacy work
  - ✓ Adoption of a position paper “[New Plant Breeding Techniques](#)”, December 2015.
  - ✓ Participation to the draft of the [position paper of IFOAM Organics International](#) adopted in November 2017.
  - ✓ Follow up of the court case on the legal status of new genetic engineering techniques (press releases after the publication of the [conclusion](#) and the [final decision](#)) (C-528/16).
  - ✓ Advocacy work coordinate with other NGOs ([common letters](#) and regular meeting with the European Commission).
  - ✓ Proposition of advocacy tools to IFOAM EU’s members for the advocacy work at national level.
  - ✓ Final event of the project (11/07/18): Debate of the agricultural sector on new genetic engineering techniques with IFOAM EU, ECVC, Copa-Cogeca, DG SANTE/European Commission.
- ✓ Results: The position of the organic sector on new genetic engineering techniques was largely disseminated amongst national and European stakeholders. On the 25<sup>th</sup> of July, the European Court of Justice decided that new techniques are GMOs and that they must be included in the scope of the GMOs legislation. This decision represents a first victory for the organic movement and its allies in the environmental movement. It is crucial to continue to work on this topic to make sure that the decision will be correctly implemented by all Member States and that biotech industries will not push for the reopening of the GMO legislation to modify the definition of GMOs and/or the scope of the legislation.

## 5. Advocacy work

- ✓ Main targets: Policy-makers
- ✓ Examples of advocacy activities:
  1. Improve the process of GMOs authorization:
    - [Juncker plan could break promise on democratization of EU GM crop decisions](#) (2015)
    - [EU Parliament holds Commission accountable for its promise to make EU GMO authorization procedure more democratic](#) (2015)
    - [Open letter to Commission President Juncker: Keeping your promise to make EU GMO decisions more democratic](#) (2015)
    - [Open letter to Commission President Juncker - Genetically Modified Organisms and democratic principles](#) (2017)
    - [Open letter - Improved EU decision-making in the area of health and consumer protection](#) (2017)
  2. Prevent GMO authorization for cultivation:
    - [Joint press release: EU Parliament opposes import of three herbicide-resistant gm crops](#) (2016)
    - [EU Parliament objects to new GMO authorizations](#) (2016)

[Open letter on new invasive species in Spain that can outcross with genetically modified maize](#) (2016)

[Oppose authorization of three genetically modified \(GM\) maize for cultivation](#) (2016)

[Member States still reject GMO cultivation](#) (2017)

[NGOs letter - Objection to the authorization of GM maize varieties - vote on the 5th April](#) (2017)

3. Promote national ban to avoid contamination:

[European parliament to vote on national GMO bans](#)

[Organic farmers call for GMO bans](#)

[MEPs confirm that environmental concerns can justify GMO bans, Commission](#)

[GMO “opt out” proposal: Governments must be allowed to protect their own national interests](#)

✓ Results:

1. Improve the process of GMOs authorization: The European Commission proposed a modification of the comitology procedure, but due to lack of political support, the proposal was abandoned. IFOAM EU has continued to follow any proposal that might influence the process of GMO authorization. In 2018, the European Commission proposed to modify the General Food Law (Regulation 178/2002) which could lead to less transparency during the authorization process of GMOs. IFOAM EU proposed amendments to this proposal and will continue to follow votes on this proposal.

2. Prevent GMO authorization for cultivation: Currently, there is only one GMO authorized for cultivation (maize MON810). Since 2016, the European Union did not propose new authorization of GMOs for cultivation.

3. Promote national ban to avoid contamination: IFOAM EU followed the process of modification of Directive 2001/18 which allow Member States to opt out GMOs cultivation based on socio-economic justification (Directive 2015/412). In 2015, 17 countries and 4 regions opted-out cultivation of GMOs on their territory. IFOAM EU will continue to follow this topic, notably to make sure Member States will updates their ban on cultivation based on the ECJ’s decision ([C-528/16](#)).

## 6. Roundtables and workshops

- ✓ Objective: gathering stakeholders, scientists, NGO representatives and EU regions working on GMO-free food production and trade, and on the prevention of GMO contamination.

- ✓ Between 2014 and 2018, 3 roundtables, 3 workshops and 1 final event were organized on different topics.

The first roundtable took place in 11-12 of December 2014 (Brussels). It gathered together 15 experts on the GMO-free supply chain to discuss the socioeconomic impact of GMOs in the entire GMO-free sector supply-chain, the technical challenges linked with the analysis and monitoring of contamination, and the current political framework.

The second roundtable (24 participants), held in Ulm, Germany, 27 of October 2015 was about the current challenges for organic and non-GM sector on the prevention of GMOs contamination.

The third roundtable was held in Bingenheim – Germany, on 7 July 2017 on seeds and feed contaminations (around 30 participants). The draft position paper on how “zero tolerance policy” should be implemented in the EU to avoid seeds contamination, was also present during this event.

The first workshop was held on 28 of October 2015 (Ulm, Germany) to discuss about the possible synergies between organic and conventional sector to increase the availability of GMO-free feed in Europe, and the alternatives to the GMO-free sector to avoid contamination (25 participants).

The second workshop on new genetic engineering techniques was an opportunity to better understand this technical topic and the consequences for the organic sector of the ongoing debate on their legal status. It was also held in Bingenheim – Germany on 6 July of 2017 (around 35 participants).

The third workshop was held in November 2017 in Fulda – Germany. The goal of the workshop was to discuss GMO-free processing aids and additives, and how to ensure their availability on the market (around 30 participants). IFOAM EU is currently working on a position and a press briefing for its members, based on the recommendations of the expert participants to the workshop.

Final event of the “Keeping GMOs out of Food” project was held in Brussels on the 11 of July 2018. The main achievements of the project – advocacy work, publications, etc. – were presented. The event was also an opportunity for IFOAM EU, La Via Campesina, Copa-Cogeca, European Commission representatives, and participating civil society organizations to debate the legal status of the new genetic engineering techniques, and different approaches to the future of agriculture in Europe.

- ✓ Results: All events organized by IFOAM EU as part of the KGOF project gathered experts on different specific topic. Those high-level debates have enabled the organic sector to adopt position and use their expertise in its advocacy work. It gave the opportunity to experts from different areas (organic sector, GMO-free sector, environmental protection NGOs, farmer union...) to exchange on their understanding of issues related to GMOs, possible solutions and main focal areas of work.



Workshop and Roundtable - Bingenheim July 2017  
Credit: Christoph Bollessen - Bingenheimer Saatgut

### 3. Conclusion and next steps

During the course of this project, that initially started in 2014 and ended in August 2018, IFOAM EU worked on different European policies in relation with GMOs, to enable the organic sector to remain GMO-free. We would like to highlight two important achievements:

- GMOs cultivation is banned in 17 countries and 4 regions in the European Union.
- New genetic engineering techniques were considered as GMOs by the European Court of Justice, which said they should be included in the scope of the GMO legislation.

Indeed, a ban on GMOs cultivation is according to IFOAM EU the best way to avoid GMOs contamination without taking any extra costly measures for the organic sector. The legal status of new genetic engineering techniques is also a crucial question: if new genetic engineering techniques are not recognized as GMOs and included in the scope of the GMOs legislation, it would be very difficult, if not impossible, for the organic sector to avoid contamination due to the lack of information (no traceability, no labelling).

It is crucial that IFOAM EU continue its work on GMOs, to make sure the great achievements will be reinforced. Particularly on new genetic engineering techniques, it is necessary to continue coordinated advocacy work to make sure that Directive 2001/18 will not be reopened to bypass the decision of the European Court of Justice. Several Member States and industry lobby groups are very active to convince the Commission to start a review of the whole EU legislation on GMOs, which is a massive threat for organic production.

This project would have not been possible or successful without the support and help of all the sponsors, foundations, participants and IFOAM EU's members. We would like to thank all of them for their different kind of support onto this project.

The fight to keep GMOs out of our food continues, and so does our work. In September 2018, IFOAM EU launched the project "Keeping GMOs out of Organic" to be able to continue its advocacy work to help the organic sector to continue to remain GMO-free. The new project continues the advocacy work and has a specific focus on new genetic engineering techniques.

To have more information on the GMOs topic or to know more about the new project of IFOAM EU on GMOs, please contact Pauline Verrière in charge of this project: [pauline.verriere@ifoam-eu.org](mailto:pauline.verriere@ifoam-eu.org).

Find more information on the new project "[Keeping GMOs out of Organic](#)" in this [link](#).



Final Event, Brussels – July 2018  
Credit: IFOAM EU



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