



1st September 2010

Dr Stuart Wainwright
Head of GM Policy and Regulation Team
Department for Environment, Food & Rural Affairs
Nobel House
17 Smith Square
London SW1P 3JR

Dear Dr Wainwright,

**SUBJECT: COMMISSION PROPOSALS ON THE FREEDOM FOR
MEMBER STATES TO DECIDE ON THE CULTIVATION OF GM CROPS**

Thank you for your letter requesting our views on the recent Commission proposal on cultivation of GM crops across the EU. As you know Gafta is the international association representing the trade in grains, feedingstuffs and general produce. Our members have considered the Commission's communication and recommendation and would like to raise some concerns.

GAFTA supports the idea to modify the Community's policy on GM and hopes that this cultivation proposal will help unblock decision making at EU level. Our members support a system that aims to improve the efficiency of the authorisation process at EU level which remains science based.

The recommendation includes a new article 26 b in Directive 2001/18 which provides a way to establish measures to avoid the unintended presence of GMOs in conventional and organic crops so no income is lost. However, the recommendation goes further in allowing member states the possibility to limit GMO content in food and feed lower than 0.9% which in our view goes too far. Member states are also permitted to create GMO free zones which the trades view as opposing the idea of a single market. It would seem to create more uncertainty for farmers, seed producers and chain of operators.

It would seem that these measures allow various different thresholds to protect organic and conventional farming and undermines the current labelling threshold of 0.9% already clearly established in law. Permitting GM free areas also moves away from the idea of harmonised rules across the EU.

The Grain and Feed Trade Association

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We are aware these new measures will be discussed after the summer break. GAFTA would appreciate if you could raise our concerns in formal discussions taking place in Brussels.

We look forward to hearing from you.

Yours sincerely,