CALL ON SOUTH AFRICANS TO BACK MANDATORY LABELLING OF GM FOOD

South Africa's food shelves are stocked with hundreds of products that contain Genetically Modified Organisms (GMOs). These are organisms whose genetic material has been altered using genetic engineering techniques.

The list includes:

- maize meal,
- GM maize ingredients in processed food that contain corn starch or corn syrup;
- GM soya in margarine, cooking and salad oils, tofu and in soya sauce, milk and meat;
- processed foods, like ice cream, burgers and fish paste;
- GM cotton seeds used in cooking oil, salad dressings, biscuits and chips.

South Africa's Consumer Protection Act (CPA) creates an opportunity for the mandatory labelling of foodstuffs which contain or are Genetically Modified Organisms (GMOs).

Section 24(4) of the CPA states that the Minister of Trade and Industry can stipulate categories of "prescribed goods" to be labelled under the CPA, these include "anything marketed for human consumption". The CPA provides for the indication of the presence of GM ingredients in certain foodstuff through appropriate description on the packaging.

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These provisions require Regulations to be drafted by the Department of Trade and Industry (DTI). To ensure that our rights are protected we call upon all consumers to write to Mr Andisa Potwana at DTI, LAPotwana@thedti.gov.za to support of the following recommendations:

That the range of **prescribed goods** should include the following:

- **All ingredients in packaged food products that are derived from GM crops (whether or not it contains any traces of GM materials);**
- **Highly processed products derived from GM ingredients;**
- **Additives and flavourings;**
- **Meat and animal products fed with GM feed;**
- **Food sold by caterers and restaurants and**
- **Unpackaged foods.**

Further:

- Labels should apply to all products that are genetically modified.
- A maximum threshold level of 1% should be permitted to allow for the accidental or technically unavoidable GM content.
- Products that are produced deliberately and directly using GM processes or have GM content, must be clearly labelled as *'produced using genetic modification'*;
- A product should only be labelled *'may contain genetically modified ingredients'* or *'may be produced using processes of genetic modification'* in circumstances where they contain ingredients that may have come from a GM process and it is not known or feasible to test whether they are GM-free.
- GM labelling regulations must define the way the terminology is used and the way it is applied.
- Restaurants and food sold direct to the public must clearly indicate any GM content.
- Labelling requirements must apply to both local and imported foods and ingredients.
- Labelling should include balanced information about the possible adverse effects on human and environmental health.
- The biotechnology corporations and the producers who have adopted them have benefited most from GM technology and should bear the costs of segregation, testing and labelling.

GMOs IN SA

Three GM crops are grown commercially in South Africa, namely, maize, cotton and soya.

In 2008/09 the following GM seeds were sold:

Crop	GM seed as % of total seed sold
Maize	52%
Soya	88%
Cotton	96%

Between 2000-2007 South Africa annually imported an average of over 1.5 million tons of maize, soy and cotton. The vast majority of these imports come from the United States, Argentina and Brazil, where these crops are predominantly GM.

South Africa is by far the largest producer of GMOs in Africa. According to industry sources, nearly 2 million hectares were planted here during the 2009 growing season.

South Africa is also the only country in the world that has planted a GM staple food – maize – on a commercial scale.

Late last year the South African Executive Council: GMO Act (the regulatory body that is responsible for biosafety in South Africa) rejected an application by the Agricultural Research Council to commercially release GM potatoes in South Africa (which would have been a world first). The Executive Council were very concerned that at the time of the application there was no system in place to segregate and label GM from non-GM.

Stacked GMOs are those containing more than one gene genetically engineered into a crop plant. In South Africa over three quarters of GM cotton planted in 2009 and in 2008 19% of the GM maize planted in the country was stacked.

In addition, research is currently ongoing in South Africa into GM sugarcane, sorghum and cassava.

VOLUNTARY LABELLING IN SA

Presently there is a voluntary labelling system in place in South Africa for GM food. A study by the University of the Free State found that 31% of the products claiming to be either 'non-GM', 'GMO-free' or 'organic' contained GM material. Clearly this indicates that a voluntary labelling system cannot work in South Africa.

PURPOSE OF LABELLING

There are three main purposes for food labelling:

- To verify food safety;
- To indicate product ingredients and
- To give consumers a choice in what they eat.

Consumers may wish to know if the food they eat contains GMOs for any number for reasons, ranging from cultural preferences to concerns about the environmental and health implications of GMOs. In addition, people may object to the fact that the biotechnology industry has gained unprecedented influence over the global food system and the policy makers that operate it.

TYPES OF LABELING

Section 22(2) of the CPA requires that labels must be in plain language that a consumer "with average literacy skills and minimal experience as a consumer of the relevant goods or services, could be expected to understand the content, significance and import of the notice...without undue effort".

Labelling could be "positive" – labels on products with GM content or "negative" – labels on products without GM content. Negative labelling would need evidence that the product had tested below a certain threshold. Negative labels could indicate:

- 'GMO free' – no GM exists in the food system at all;
- 'non-GM' – GM is not present above a minimum threshold; and
- 'organic' – contains no GM, or contains GM below a minimum threshold.

SEGREGATION, IDENTITY PRESERVATION AND TESTING SYSTEMS

For labelling to have integrity, consumers must be confident that the label is accurate and that the information on a label can be verified. Systems to segregate food products based on factors such as nutritional properties are already in place in South Africa. The South African National Standards has benchmarks in place covering the complete value chain of a product, from production, transport and storage to sampling and testing. The grain and oilseed industry have similar standards covering exports and domestic consumption. All of these systems could be adapted to apply to GM foods.

There are two main methods for testing for GM presence in food: protein based and DNA based. Protein based tests are cheaper, but cannot detect GM presence below a 1% threshold. DNA tests can detect much smaller quantities of GM, but the costs are higher and the results take longer to obtain. For processed foods such as cooking oil or sugar syrups derived from maize, the refining process tends to eliminate all traces of GM content. Labels on these products should indicate that the process involved used GM.

THE COSTS OF LABELLING GMOs

A Canadian study found that the greatest proportion of increased cost from mandatory labelling would be in the production segment. The raw materials share of the final cost of a product would increase by 9-10%.

In South Africa, between 2004-2007 raw materials were equal to between 24% and 67% of the final cost of maize meal. Based on these figures, mandatory labelling would result in food price increases ranging from 2.4% - 6.7%.

The costs of segregation, testing and labelling should be borne by those who have benefited most from GM technology, which at the present time are the biotechnology corporations and the producers who have adopted them. We do not believe that consumers should pay for the costs of labelling. Consumers had no say in producer decisions to adopt GM technology.

Government costs associated with regulation and enforcement should be subsidised through a levy on GM seed sold, the costs of which should be borne between the technology licence holders and the seed purchasers.

THE CONSUMER'S ROLE

We call on all South Africans to exercise their democratic right and contact their MPs to echo the recommendations for the labelling of GMOs. It was the public outcry that forced the pharmaceutical industry to provide HIV/AIDS treatment at affordable prices to the majority of South Africans. The issue of a democratic food system that can provide safe, nutritious and affordable food for all is no less urgent!

The information in this fact sheet was taken from the ACB briefing paper: 'Traceability, segregation and labelling of genetically modified products in South Africa'. Available at:

http://www.biosafetyafrica.org.za/images/stories/dmdocuments/ACB_Policy_Labelling-201005.pdf

For more information on GMOs in South Africa please visit:

www.biosafetyafrica.org.za

http://www.biowatch.org.za/

http://www.safeage.org/