



GREENPEACE



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Further Information

Greenpeace is happy to provide additional information regarding the True Food Guide rating system, or any health, environmental or liability issues surrounding GE foods. For further information contact:

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Other useful information sources include:

Food Standards Australia New Zealand (FSANZ)

FSANZ have produced a briefing on GE food labelling which touches on Identity Preservation issues. It is available online at:

http://www.foodstandards.gov.au/srcfiles/user_guide_GM_labelling_0817.pdf

Australian Competition and Consumer Commission (ACCC)

The ACCC has made numerous rulings regarding GE food labelling, including GE free chicken labelling and positive labelling claims. These can be viewed on the commission's website:

<http://www.accc.gov.au>

Non-GE supply chains

A guide for Australian Food Companies

August 2005

"As far as we're concerned our products are all about the taste, and going GE free is a logical step to ensure our ingredients are wholesome and natural."

CEO John Tolmey , Darrel Lea Chocolates 2005

About this kit

Since publishing the first True Food Guide in 1992, Greenpeace has been working with a large number of Australian food companies to help keep genetically engineered crops out of the food chain. The vast majority of food companies have removed GE ingredients from their products in order to avoid labelling. An increasing number of companies are responding to public and consumer concerns and are taking the next step of removing GE from their entire supply chains – including from highly processed ingredients and animal feeds.

This kit has been compiled in response to countless conversations with food companies, many of whom are looking for guidance and information to help them to avoid GE in their supply chains and thereby achieve a GREEN rating in the True Food Guide.

Why adopt a non-GE policy?

The main reasons for so many companies adopting a non-GE policy is in response to consumer demand, however some companies have excluded GE from their supply chains as part of their corporate social and environmental responsibility policy.

Consumer attitudes to GE

A 2002 Taylor Nelson Sofres poll found that the majority of Australians (68%) are less likely to buy or will avoid food made from GE plants or animals. This result is consistent with other polls that have been conducted in Australia. Similar attitudes to GE exist in other countries. A survey by the Pew Global Attitudes Project, released in June 2003, shows that Western Europeans and Japanese consumers are overwhelmingly opposed to scientifically altered fruits and vegetables because of health and environmental concerns. In recent years, consumer resistance to GE foods has increased dramatically. For example, a recent survey by the Thai government's Agricultural Economics Office found that 91% of consumers there were concerned about the health effects of GE crops.

Environmental issues

There are serious concerns regarding the environmental impact of GE crops. These include biodiversity impacts, genetic pollution, increased pesticide use and the emergence of pesticide resistant weeds and insect pests. The likely long term impact of GE crops within complex ecosystems remains unknown.

Liability issues

The environmental and health risks associated with GE crops raise serious liability issues. Companies that use GE derived ingredients may be faced with future litigation and compensation claims. The European insurance industry has advised its members to add exclusion clauses to avoid liability for any health effects of GE foods.

What does a non-GE policy mean?

Australia's current GE labelling laws only cover a small part of GE exposure, therefore, just because a product or brand is exempt from GE labelling under the food standards code does not mean that it is non-GE. For example, under the FSANZ labelling requirements, an oil derived from

GE testing services

The following companies provide services for detection of Genetically Modified Organisms (GMOs):

AgriQuality

3-5 Lillee Crescent
247 478
PO Box 1335 Tullamarine
VIC 3043

Phone: +61-3-8318-9000; Toll free (Australia): 1800

Fax: +61-3-8318 9001

Web: www.agriquality.com

Email: info@agriquality.com

Genetic-ID (International service)

Phone: +1-641-472 9979

Web: <http://www.genetic-id.com/>

Email: info@genetic-id.com

The Gribbles Group

GMO Testing Lab
1868 Dandenong Rd
Clayton
VIC 3168

Contact: Dr Rick McCoy

Phone: +61-3-9538 2241

Fax: +61-3-9538 6778

Web: www.gribbles.com.au/gmoTesting.htm

Email: dna@gribbles.com.au

Silliker Microtech Pty Ltd

Melbourne
20 King Street
Blackburn
VIC 3130
Phone: +61-3-9877 8222
Fax: +61-3-9877 8444
Web: www.silliker.com
Email: sales@sillikermicrotech.com

Sydney
Unit C2 Regents Park Estate
391 Park Road
Regents Park, NSW 2143
+61-2-8718 6888
+61-2-8718 6899

Non-GE suppliers

If you are experiencing difficulties sourcing non-GE ingredients, the *2005 Non-GMO Sourcebook* is a good starting point. It features over 500 non-GE suppliers and service providers, including seed companies, growers, grain suppliers/exporters, processors, ingredient manufacturers, food manufacturers, GE testing labs, GE test kit manufacturers, and IP consultants. Contact:

Writing Solutions Inc
PO Box 436, Fairfield IA 52556 USA
Phone: +1-641-472-1491
Fax: +1-641-472-1487
Email: ken@non-gmosource.com
Web: www.non-gmosource.com

Foods at risk of being GE

GE crops in Australia

The only GE crops currently grown in Australia are cotton and carnations. GE canola was approved for commercial release by the federal gene regulator in July 2003. However, state-based moratoria have ensured that, at time of writing, no GE canola has been planted. Therefore, the only legal sources of GE contamination of Australian grown produce are GE cotton seed oil, or GE cotton seed meal.

Imports

While there have been many field trials of different GE crops around the world, commercial growing is largely restricted to corn, canola, cotton and soy in the following countries:

Crop	Country of origin
Corn	Argentina, Canada, Mexico, USA
Soy	Argentina, Brazil, Canada, USA
Canola	Canada, USA
Cotton	Australia, Argentina, USA, China

Use of GE feed in intensive livestock industries

Poultry

In early 2005, Australia's three largest poultry companies committed to source non-GE feed. At the time of writing, implementation of this policy is still ongoing and assurances must therefore be sought regarding the non-GE status of poultry feed.

Pork

The Australian pork industry relies on imported soy meal which may be GE unless specified otherwise.

Beef

Some Australian beef cattle may be fed GE cottonseed meal or GE soy meal unless specified otherwise.

Dairy

A number of major Australian dairy companies ensure that their dairy cows are not fed GE feed. However, in some cases, GE cottonseed meal is used as a supplementary feed for dairy cows, particularly during drought periods.

Summary of at-risk ingredients

Food

- soy and corn food products imported from the USA or Argentina;
- Australian cottonseed oil;
- poultry products from chickens fed GE feed;
- pork products from pigs fed GE feed;
- beef products from cattle fed GE feed;
- milk products from cows fed GE feed.

Animal feed

- soy meal from the USA or Brazil;
- cottonseed meal from Australia.

A more detailed overview of GE in the Australian food chain is available on the True Food website:

http://www.greenpeace.org.au/truefood/downloads/overview_of_ge_in_australia_march04.pdf

How to remove GE ingredients from your supply chain

1. Conduct an audit

Evaluate the exposure of your supply chain to GE. Use the information provided here about possible sources of GE contamination to determine the likely areas of exposure of your supply chain. Audit all ingredients used in your production for their GE status.

2. Make the commitment – adopt a non-GE policy!

Write a statement regarding your commitment to adopting non-GE production, and include it in your company policy. Once you have made a commitment and have a rough timetable for implementation, your brands can be listed in the orange category of the True Food Guide.

3. Implement the policy

The steps you'll need to go through to ensure a non-GE supply chain are detailed in the flow chart on the following page.

Contact all of your suppliers and ask for their GE policies. Send them your new company policy. It is important that suppliers receive clear messages regarding the market demand for non-GE products. The stronger the signals that suppliers receive, the easier it will be to maintain non-GE products in the supply chain. Replace any GE ingredients with non-GE ingredients.

4. Verification and ongoing evaluation

In order to be confident as to the veracity of the non-GE statements provided by your suppliers, you may need to request Identity Preservation (IP) certification. This is certainly required when purchasing imported soy and corn foods.

IP maintains the identity of different products. It involves a process of separate storage, handling, documentation and testing of the product's identity. IP aims to capture the extra value of a product by preventing its mixture with ingredients that do not contain that characteristic (i.e. non-GE ingredients). Once mixing occurs, opportunity for the higher-value product is lost. IP is already used by producers of seed, malting barley, non-allergenic products, organic and value-enhanced crops, and many food products.

Testing for GE contamination

Testing should be done when the GE status of the food:

- cannot be established by a paper trail; or
- varies from batch to batch; and
- there are suitable test methods available.

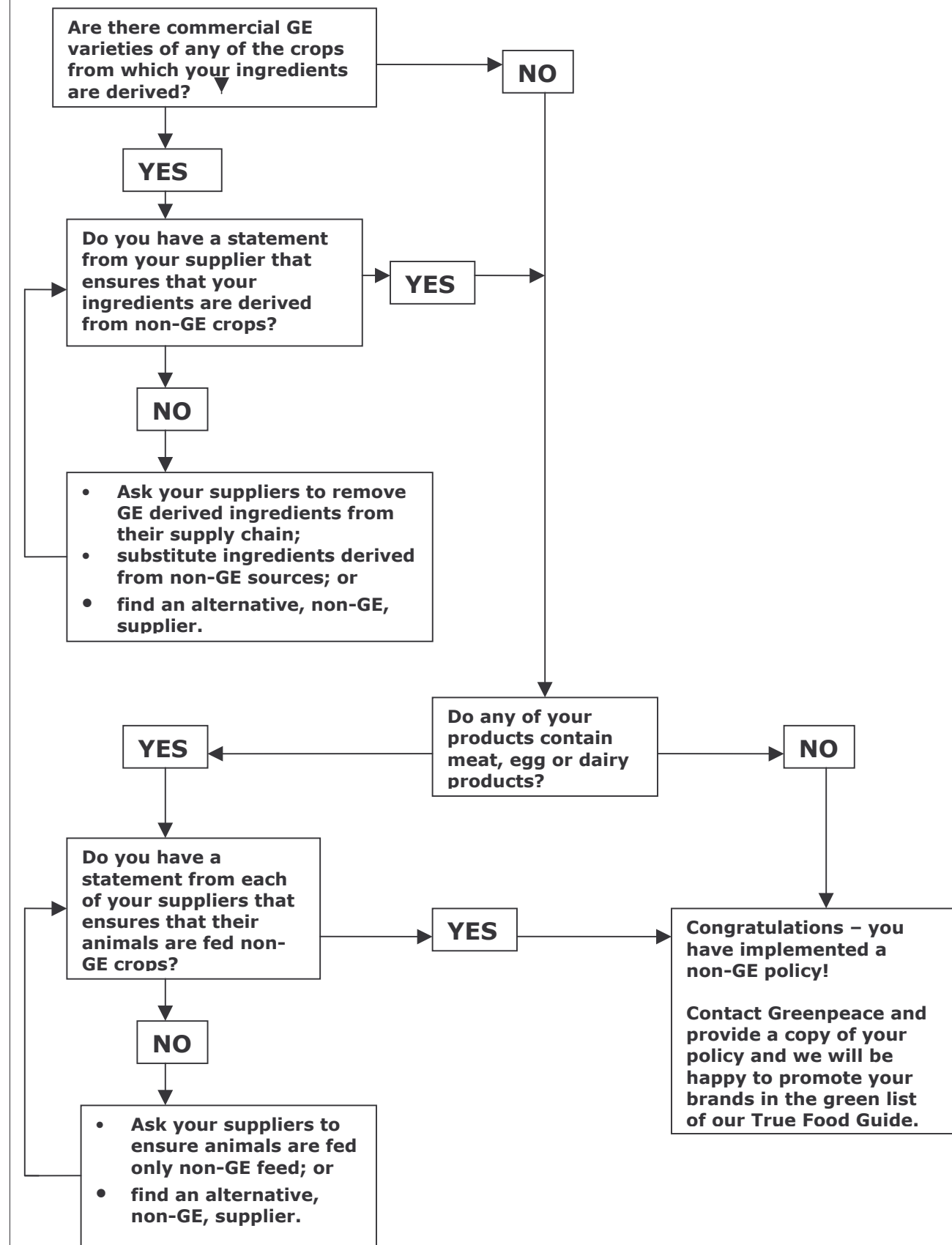
Occasional testing may be necessary to confirm the validity or reliability of the paper trail to demonstrate that all reasonable steps have been taken; for example, where variation exists in the supply or use of the food or ingredient, or to assess the reliability of the supplier.

There are currently two main test methods applicable to determine the GE status of food and ingredients. These are:

- the polymerase chain reaction (PCR) test for DNA, and
- enzyme-linked immunosorbent assay (ELISA) for protein.

A list of GE testing laboratories in Australia is provided at the back of this leaflet.

Fig. 1. How to remove GE ingredients from your supply chain



100% GE crops does not need to be labelled as GE. Greenpeace and a number of other consumer groups believe that this is misleading. Therefore, in order to have a non-GE policy and to gain a Green rating in the True Food Guide, Greenpeace asks companies to remove:

1. whole and processed GE ingredients
2. refined foods that are derived from GE ingredients
3. ingredients derived from animals fed GE feeds

Who else has a non-GE policy?

In response to consumer demand, many Australian companies have adopted non-GE policies and are rated as Green in the Greenpeace True Food Guide. Below is a selection of non-GE policies from a range of small and large companies. Policies for hundreds of food companies are listed online on the True Food website: www.truefood.org.au

Darrell Lea GE policy:

"Darrell Lea has taken all reasonable steps to review all ingredients as technically possible and confirm that we use non GE ingredients, non GE derived ingredients and ingredients derived from animals fed with non GE feed. Suppliers have been changed and will continue to be changed where necessary to replace any ingredient to ensure non GE ingredients and non GE derived ingredients are used by Darrell Lea. We will audit our suppliers to ensure they satisfy the requirements of non GE ingredients and non GE derived ingredients. Darrell Lea has and will continue to verify the use of non GE ingredients and non GE derived ingredients." Maria Dominello, Food Technologist, September 2004.

Dairy Bell GE Policy

"Dairy Bell's brand policy is that we do not use genetically engineered (GE) ingredients, derivatives of GE products or animal products fed on GE stock feed in any of our products." Karl Razums, National Sales Manager, July 2003

Unilever Australia GE policy:

"Unilever in Australia and New Zealand has reviewed all ingredients as much as is technically possible and worked to eliminate genetically modified crop derived ingredients, through substitution, sourcing from areas where non-genetically modified crops are grown and IP systems. In addition Unilever Australasia sources it's dairy ingredients locally and our dairy ingredient suppliers have established contracts with their milk suppliers stipulating that the animals are to be fed with non-genetically modified feed." Garry West - Corporate Relations Manager, April 2002 - relevant at July 2003.

Kikkoman Sauces GE Policy

"We recognise that there is public concern relating to Health and the Environment. Therefore, since the latter part of 1999, we have only sourced raw materials that are certified Non-GM by a Relevant Authority from Suppliers who can provide documentation to support this claim." Mas Watanabe, Managing Director, April 2002.

Lloyds Vineyard Company Policy

"It is the policy of this Company to
 (1) use only certified Organic products and ingredients at all stages of production and processing. We therefore do not use any genetically engineered (GE) ingredients, derivatives of GE products or animal products fed on GE stock feed.
 (2) source external inputs only from suppliers who can provide documented evidence and/or Identity Preservation records to verify the GMO-free status of their products.
 (3) wherever appropriate label products as GM free." Darren E. Lloyd, Managing Director, 2003.