

Environment and Spatial Planning
Ministry of Housing, Spatial Planning and
the Environment

> Returnaddress P.O. Box 30945 2500 GX The Hague

COURTESY TRANSLATION

The European Commission
dg. Environment
Ms. Chantal Bruetschy
Avenue de Beaulieu 9
1160 Brussels
Belgium

**Environmental Protection
Office**

Environmental Safety and
Risk Management
Directorate
Taakveld genetisch
gemodificeerde organismen

Rijnstraat 8
P.O. Box 30945
2500 GX The Hague
Internal Postal Code 645
The Netherlands
www.vrom.nl

Contactperson

Drs. R.P. Dekker

T +31 (0)70-3394639

F +31 (0)70-3391316

Date January 29, 2010

Subject EC Questionnaire on socio-economic aspects of genetically modified
organisms

Dear Ms. Bruetschy,

We are pleased with the EU consultation process regarding the socioeconomic aspects of genetically modified organisms (GMOs). We thank the European Commission for the questionnaire regarding the experiences gained in growing GMOs in the EU. Attached to this letter is the questionnaire, filled in by the Netherlands. Because there has been no commercial cultivation of GMOs in the Netherlands up to now, we can in this questionnaire only provide very limited *ex-post* socio-economic analyses supported by evidence and data, as requested by the Commission. However, considerable progress has been made in the past year in the Netherlands in the more general discussion regarding the socioeconomic aspects of GMOs. With this letter, we want to submit the questionnaire as filled in by the Netherlands to you and inform you of the Dutch activities and views with respect to socio-economic aspects of GMOs. We consider this information relevant to the consultation process, and therefore we ask the European Commission to take the content of this letter into account when drawing up the report to the European Council and the European Parliament.

Activities in the Netherlands in the area of socioeconomic aspects

In the past year, the Netherlands has been actively engaged in developing its views on socioeconomic aspects of GMOs, both in a national and an international context. Below is a concise summary of these efforts.

Criteria for socioeconomic aspects of GMOs

We understand socioeconomic aspects to mean sustainability in the broad sense: *people, planet, profit*. COGEM (*Commissie Genetische Modificatie* - the Netherlands Commission on Genetic Modification) has developed building blocks of a framework to evaluate the conditions under which GMOs can contribute to improving sustainability. COGEM formulated criteria for GMOs around nine themes. COGEM notes that in order to apply these criteria in practice, measurable and objectifiable indicators need to be developed. The COGEM report is enclosed with this letter.

COURTESY TRANSLATION

**Environmental Protection
Office**

Environmental Safety and
Risk Management
Directorate
Taakveld genetisch
gemodificeerde organismen

In its observations, COGEM makes a distinction between themes that are particularly relevant to the cultivation of GMOs in the EU and themes that can be relevant for the cultivation of GMOs elsewhere. With respect to cultivation in the EU, COGEM observes that the themes welfare and health and local food supply are not under discussion (anymore). Furthermore, COGEM observes that for four of the criteria there is existing EU policy in the form of legislation and regulations. This concerns the criteria safety, freedom of choice, biodiversity and environmental quality. Therefore, these criteria can be assessed based on existing legislation.

Date

January 29, 2010

Three themes have not been included in policy: societal benefit, prosperity and economy and cultural values. Currently, societal benefit, prosperity and economy are values that are for the major part left to the market. In addition, currently the theme of cultural values does not play a role in the evaluation. However, this is a theme that pre-eminently plays a background role with various parties when determining their standpoint concerning GMOs, for instance, if they see GMOs as a threat to traditional forms of agriculture.

We consider it important that when considering cultivation of genetically modified crops in the EU Member States, these three themes, which cannot be assessed on the basis of current regulations, can be taken into account. By giving Member States the possibility to decide on cultivation of GMOs on their own territory, Member States can gain experience with these themes, if they so wish.

International conference

On 25 and 26 November, an international conference was held in The Hague. The objective was to exchange views regarding the socioeconomic aspects of genetically modified crops with others, in particular other EU Member States. Amongst other subjects, the Dutch proposals to arrive at effective EU decision making on the authorisation of genetically modified crops and the desire to achieve more sustainability were discussed. Reference was made to the "guidelines for the new Commission" by Commission president Barroso, which state that it should be possible to combine a Community authorisation system, based on science, with freedom for Member States to decide whether or not they wish to cultivate GM crops on their territory. Although the Dutch proposals and their further elaboration raised some objections and several questions with European partners, there was considerable support for the main objective of the proposals. Many participants from the Member States expressed the wish to achieve this objective within the existing GMO legislation, or with minimum amendments to the legislation.

A report of the conference has been distributed to all participants and is also attached to this letter. This report has already been distributed amongst the Member States via the Agricultural Council and the Environmental Council of December 2009.

COURTESY TRANSLATION

**Environmental Protection
Office**

Environmental Safety and
Risk Management
Directorate
Taakveld genetisch
gemodificeerde organismen

Consequences of asynchronous admission of GMOs

The adventitious presence in raw materials for food and feed of traces of GMOs that have not (yet) been approved for use in the EU, leads to trade problems, can harm the competitive position of the industry and can lead to the loss of employment. This has been described in the report "EU policy on GMOs: a quick scan of the economic consequences" drawn up by the Wageningen University and Research Centre. We want to take this opportunity to provide you with a copy of this report.

Date

January 29, 2010

We appreciate the attention that you have shown for this problem by announcing in 2008 that you will make proposals for a technical solution. However, in view of the potential socioeconomic consequences of this issue, we urge you to put forward such proposals very soon. The *zero tolerance* for GMOs not admitted to the EU remains an important basic principle when drawing up these proposals.

View of the Netherlands on the European discussions regarding socioeconomic aspects of GMOs

As already indicated in the Environmental Council of March 2009 in the explanation of the Dutch vote on GMOs, we call for a change in European decision making. In our view, EU market authorisation by the European Commission of GMOs for cultivation and import should remain possible only after a thorough safety assessment, taking into account human and animal health and the environment. However, Member States should be given the right to decide whether to allow the cultivation on their territory of GMOs, which have been assessed and found to be safe at the EU level. This policy option can be used by Member States that wish to do so, to apply socioeconomic criteria in their decisions regarding the cultivation of GMOs on their territory.

The current system of careful safety assessment of GMOs agreed in the EU is adequate. However, in addition to concerns about the risks to the environment and human health, socioeconomic aspects also play a role in the European discussions and in determining positions on the GMO authorisation. The report addressing these aspects, that the European Commission will submit to the Council and the European Parliament before the summer of 2010, can form the basis for an open and constructive debate on these aspects. This debate should focus on the question of how these aspects can play a role in the European GMO policy. As input to this debate, we have introduced a number of socioeconomic criteria with this letter and the attached COGEM report. To be able to apply the criteria in practice, objectifiable and measurable indicators must be developed for use with these criteria. Furthermore, WTO conformity is important.

COURTESY TRANSLATION

Page 3 of 4

COURTESY TRANSLATION

We are looking forward to a decision in the short term regarding GMO cultivations and the further European discussions regarding the socioeconomic aspects of GMOs, in which we hope to find, together with the other Member States and the European Commission, solutions that are acceptable to all parties and that contribute to both improved sustainability and effective decision making with respect to GMOs.

Yours faithfully,

the Minister of Housing,
Spatial Planning and the Environment,

dr. Jacqueline Cramer

the Minister of Agriculture,
Nature and Food Quality,

G. Verburg

**Environmental Protection
Office**

Environmental Safety and
Risk Management
Directorate
Taakveld genetisch
gemodificeerde organismen

Date

January 29, 2010