CropLife International Position on Labeling

CropLife International strongly supports requirements for accurate and informative product labels which communicate information that is relevant to health, safety, and nutrition. Labels that include marketing claims should be substantiated, truthful, and not mislead consumers nor imply non-existing safety concerns. CropLife International's position supports the 2011 Codex Alimentarius text for labeling of biotech-derived products which confirm that existing labeling texts for food generally also apply to biotech foods, and clearly state that there is no intent "to suggest or imply that foods derived from modern biotechnology are necessarily different from other foods simply due to method of production."

Labeling of foods derived through biotechnology does not advance consumer health information. Before entering the food supply, biotech foods and ingredients must be approved for food safety by the national regulatory approval process. All scientific information to date supports the view that there are no health or food safety concerns with products derived from biotechnology. CropLife International supports advancing labeling standards for foods, whether developed through biotechnology or another method, if there is a change in nutritional composition or if an added component could be toxic or allergenic. Such labeling standards should be based on the quantifiable chemical characteristics of the food product and not the method of production. This ensures labeling that is measurable, objective, science based, verifiable and enforceable.

Food labels are often considered one way to support consumer choice and allow for differentiation of products in the marketplace. However, governments considering the implementation of labeling systems must carefully weigh the need to provide necessary and accurate safety information with the additional costs associated with labels that include marketing claims and non-health related information.

Voluntary labeling systems can highlight food characteristics of interest to consumers — as long as the information is truthful and not misleading — and can aid their purchasing choices in the marketplace. An example of this is organic labels in many countries which provide consumers with a choice should they wish to consume foods produced according to particular agricultural practices. Additionally, a labeling regime is not meaningful or reliable unless it is used correctly, so countries also have to consider the development of a system of monitoring and enforcement of labeling requirements.

CropLife International believes that for any labeling provisions to be enforceable in relation to biotech-derived foods, they should be supported by reliable, validated methodologies for detecting the presence of transgenic protein or DNA. Workable labeling threshold levels for the presence of biotech-derived material in food, feed and food ingredients are needed to facilitate accurate and truthful labeling.

Labeling requirements should be science-based to give consumers meaningful information about the foods they buy and eat. Developing labeling regulations outside these scientific principles distracts attention from the legitimate health, safety and nutritional issues related to food products. Mandatory biotech food labeling provisions are costly to consumers, producers and governments and can unnecessarily inhibit the development of innovative technologies to help feed a growing global population.

Updated 29 February 2016

Background

The issue of labeling for food products containing biotech ingredients is one that has been debated at length by both national governments and international standard-setting bodies for many years. Consensus among global regulatory bodies on the need for and potential implementation of biotech labeling regimes has been attempted via the *Codex Alimentarius* Commission—the international food standards setting body established by the UN Food and Agriculture Organization and the UN World Health Organization. In July 2011, after 20 years of negotiation, Codex adopted a text that does not endorse mandatory labeling; instead the text explicitly states that "any approach implemented by Codex members should be consistent with already adopted Codex [labeling] provisions." It also clearly states that there is no intent "to suggest or imply that foods derived from modern biotechnology are necessarily different from other foods simply due to method of production."

In addition to the work at the international level through *Codex Alimentarius*, numerous countries have implemented their own domestic rules relating to labeling of foods containing biotech ingredients. While domestic labeling rules vary considerably, they tend to fall into two categories: mandatory or voluntary labeling. Some countries, such as the European Union and Brazil, have mandatory labeling laws that specify clear rules that must be followed when food products are known to contain biotech ingredients. Other countries, such as Canada and the United States, have put in place voluntary labeling frameworks. Labeling regulations around the world differ widely in their scope, labeling exceptions for certain types of ingredients, and degree of enforcement. Because of these differences in approaches, a food product with biotech-derived ingredients that must be labeled in one country does not necessarily have to be labeled in another country. Consequently, the observed effects of these policies on consumer choice, consumer information, food marketing, and international trade also vary significantly.

CropLife International strongly supports requirements for accurate and informative product labels that communicate information that is relevant to health, safety and nutrition. The plant biotechnology industry opposes any wording that may cause confusion between the very different issues of "informed consumer choice" and "consumer health."

Labeling for consumer choice is not a safety issue, and labeling which suggests otherwise is contrary to the evidence compiled from the numerous and thorough safety assessments that biotech-derived foods undergo before entering the marketplace. After 20 years in the marketplace, there is no evidence that biotech-derived foods, which are carefully evaluated and widely grown and consumed worldwide, have had any adverse effects on human or animal health.

Implementation of mandatory labeling is an expensive undertaking for farmers, industry, government and consumers. To be effective, any biotech food labeling requirements must be enforced in order to assure compliance. Consideration needs to be given to the capacity and resources required for national authorities to implement and enforce labeling regimes. Testing laboratories, trained personnel, both for enforcement and regulatory branches of government also require significant resources for implementation, as mentioned in the 2007 IFPRI brief[1] on international labeling policies of biotech foods summarized the findings of several studies on the costs of biotech food labeling.

[1] http://www.ifpri.org/sites/default/files/publications/pbsbrieflabeling.pdf