

Helsinki, 17 May 2006

Ladies and gentlemen,

The Finnish Consumers' Association is a non-political organisation open to all. The Association has 63 local affiliates that have just under 2000 members. In addition, 300 Finnish consumers belong directly to the Consumers' Association. Furthermore, the Association has 10 organisations as members, the largest of which is the Central Organisation of Finnish Trade Unions SAK.

The Finnish Consumers' Association has issued a statement on genetically modified organisms, which dates to 2000. The principles of this statement still hold, even though all the details of the document might not be completely up to date any more. The Finnish Consumers' Association takes a practical view on GMOs: the EU market has accepted certain genetically modified foods and we have to learn to live with them. We are also aware that we have members who approve of genetic engineering. Because of this, the Finnish Consumers' Association stresses the rights of the consumer above other matters in its statement on genetic engineering.

Consumers have the right to knowledge

Genetic engineering is a new way of producing food that is seen by many as questionable. Consumers simply do not have enough knowledge of genetically modified foods. In addition, outright scare campaigns upheld by many different sources have created insecurity among consumers.

The labelling of genetically modified foods gives consumers information upon which to base decisions. There are consumers who demand information on all the steps of the production of a food item. They feel that if a farm animal has been fed with genetically modified fodder, this should be marked on the label of the product made from that animal. The Finnish Consumers' Association has not demanded this type of labelling. It is the view of the Association that consumers demanding complete information on the different phases of production of a food item are best served by labelling that includes information on the origin of the product and the contact information of its producer or importer. The consumer can then contact either of these to get the information he or she needs. Furthermore, the Finnish Consumers' Association continues to stress that the home economics curriculum of comprehensive schools should include the teaching of basic information on genetically modified foods.

Consumers have the right to alternatives

Genetically modified foods should not be the only kind of food available to consumers. Genetic engineering is forbidden in the production of organic foods. However, buying only organic foods is not a realistic option for those who absolutely want to avoid genetically modified foods. In Finland, many organic foods are expensive in comparison to other products and their selection is very restricted. The Finnish Consumers' Association has proposed that, as genetically modified foods become more and more popular, retailers should also continue to stock foods produced in the traditional manner.

Consumers have the right to make a difference

The negative attitude of consumers towards genetically modified food has prohibited GM food from reaching the market in Finland and elsewhere in Europe. There is not enough interaction between genetic engineering research and administration, and the different links in the food chain. Only an open dialogue on the matter can give the consumers the possibility to make their own choices based on actual information. The Finnish Consumers' Association believed that the implementation of the *Regulation of the European Parliament and of the Council on genetically modified food and feed* (Number 1829/2003) would give consumers a real possibility to make a difference. We now see that this belief was rather naïve. Article seven of the regulation deals especially with informing and hearing the public on genetically modified organisms. In Finland, according to this Article, the Finnish Food Safety Authority Evira (formerly the Plant production Inspection Centre (KTTK)) is in charge of informing the public of the summaries of the applications for the authorisation of GMOs published by the European Food Safety Authority (EFSA) as well as of statements given by EFSA. It is also in charge of giving citizens the possibility to comment on the statements.

The first instance of hearing the public on GM food after the coming into force of the Regulation in March 2005 demonstrated that the purpose was actually not to hear the opinion of the consumers. Only four comments were received from the entire EU area, and one of these came from Finland. If the EU finds it important to promote genetic engineering, we wonder why no effort has been put into hearing consumers on the matter. Giving insufficient and superficial information on genetic engineering to consumers will only turn consumers against it, which will then prohibit any inventions, even good ones, from reaching the market.

The Finnish Consumers' Association commented on the matter in its letter to consumer commissioner Markos Kyprianou. The answer was that the commissioner understands our concern over the fact that in order to comment on the matter the consumer has to read a long document written in a foreign language. However, the commissioner believes that the number of comments will go up as the public becomes more aware of its possibility to take part in making decisions concerning the accepting of genetically modified foods and fodder. Up to now, the commission has not done anything to promote the hearing of the public on the matter.

In addition, the Finnish Consumers' Association has proposed that a representative of the consumers be named for the national Novel Foods Board of the Ministry of Trade and Industry. The answer to this proposition was negative. The explanation was that places on the Board are reserved for specialists, not representatives of different interest groups.

The Finnish Consumers' Association understands the possibilities of safe genetic engineering in the food market. We also understand why consumers reject or have difficulty in accepting technology that has brought no apparent benefits to the consumer. The taste of food has not improved and the price of food items does not seem to be going down. It is a shame that the biotechnology sector itself ruined the application of genetic engineering in the food sector. It seems that the wrong companies tried to bring genetically modified crops into the EU market. The most prominent example in Finland was Monsanto that became known for its pesticides. The matter was left into the hands of the wrong people. At least in Finland, regular consumers rarely use soy or corn as part of their diet.

In addition, the time was wrong for the introduction of the products – the EU did not yet have the regulation concerning novel foods and novel food ingredients, nor legislation to do with the labelling of food.

All in all, Finnish consumers have a calm approach to things. Many people seem to think that food crises are not life-altering events. Some have said “Well, there was also the Winter War and we survived that too”. We at the Finnish Consumers’ Association have noted that consumers do not panic in the face of different threats that they themselves can avoid. To prevent unfounded fear, the Finnish Consumers’ Association has arranged tens of discussions on genetically modified food over the last ten years. The consumers have been informed on genetic engineering and on how they can avoid GM food if they want to. I believe that the moderate approach taken by the Finnish Consumers’ Association has had a calming effect in Finland in general. As a matter of fact, the biology sector should be grateful to one Finnish taxi driver who sat on the board of the Association and stated, as the board was preparing its first statement on genetic engineering, “We cannot be opposed to genetic engineering in food if we feel that it is a valuable and important technology in the manufacturing of medicines”.