

EU MARKETS

NO MARKET FOR GM
LABELLED FOOD IN EUROPE

REPORT 2005

NO MARKET FOR GM LABELLED FOOD IN EUROPE



GREENPEACE

EU MARKETS

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PUBLISHED JANUARY 2005



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GREENPEACE

published by Greenpeace International

date January 2005

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printing PrimaveraQuint, The Netherlands

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no market for GM labelled food in europe

A Report on the use of GMOs and genetically modified food ingredients in the European Food Industry. Based on GM policy statements of top ranked retailers and food and drink producers in Europe.

TOP RANKED RETAILERS AND FOOD AND DRINK PRODUCERS IN EUROPE

RETAILERS	FOOD AND DRINK PRODUCERS
Ahold	Allied Domecq
Aldi	Altria Group (Kraft Foods)
Auchan	Arla Foods Amba
Big Food Group (Iceland)	Barilla
Boots	Bonduelle
Carrefour	Cadbury Schweppes
Casino	Campbell Soup
Coop Italia	Carlsberg
Coop Norden	Chiquita
Coop Schweiz	Cirio del Monte
Coop Group UK	Coca-Cola Company
Edeka	Danish Crown
ITM (Intermarché Les Mousquetaires)	Danone
Kesko	Diageo
Leclerc	Eckes
Louis Delhaize	Ferrero
Marks & Spencer	Heineken
Mercadona	Heinz
Metro Group	Interbrew
Migros	Kellogg
Morrisons	Mars
Rewe	McCain Foods
Safeway	Nestlé
Sainsbury's	Northern Foods
Schwarz Group (Lidl and Kaufland)	Oetker Group
Somerfield	Orkla
Système U	PepsiCo
Tengelmann	Sara Lee
Tesco	S&N (Scottish & Newcastle)
Wal-Mart	Unilever Group

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INTRODUCTION/EXECUTIVE SUMMARY

introduction

Greenpeace is campaigning for a ban on the release of GMOs (genetically modified organisms) into the environment because of the dangers they present to the environment, and uncertainty about the risks they present to food safety and food security. We are campaigning for an environmentally sustainable GM-Free agriculture.

The food industry has been one focus of Greenpeace campaigning since GM soya was first mixed, unasked and unwanted, into food exports to Europe from the US in 1996. At that time the vast majority of European food retailers and food and drink producers had a policy that either supported the use of GM ingredients or was often unaware or unconcerned about their use.

At that time and for the next few years many European food companies and in particular their trade associations said, loudly, that GM crops would soon have consumer benefits and that anyway there was now no way to avoid using them because they were mixed into the commodity soya and maize ingredient supplies coming from the US.

In the following 8 years there has been a prolonged and at times intense public, political and scientific debate about the dangers of GM crops, which has had a number of results. One of the most significant has been the strong and consistent rejection of GM food by well-informed consumers and the change that they have caused in the policies of the European food industry. Another has been the introduction of GM food ingredient labelling laws in Europe.

The new European labelling and traceability legislation on genetically modified food and feed (Regulation (EC) No 1829/2003 and Regulation (EC) No 1830/2003) came into force on 18 April 2004 and means that a greater range of GM food ingredients now require labelling, in particular this is relevant to e.g. soya and maize oil and for the first time animal feed also now requires labelling.

Greenpeace wanted to know how companies were reacting to the new legislation and so over the last year, before and after the introduction of the new EU legislation, Greenpeace offices in most of the European Unions member states, including several of the EU accession countries, have been contacting retailers and food producers relevant in their market asking for a company policy statement on the use of GM ingredients in their food products.

This report summarises the responses of the 30 top retailers and a selection of 30 of the top food and drink producers in Europe. While some companies choose to reply by using our standardised questionnaires, the majority of the companies provided us with their own company statements (copies available on request).

Complementary to the survey of company GMO policies, Greenpeace "Gene Detectives" have since April 2004 been inspecting supermarkets and food stores in the 25 European member states for labelled GM products. This on-the-ground-check has allowed us to better understand if the reality in the stores matched the company statements. These inspections of supermarkets are currently ongoing.

editing note: GM (Genetically Modified) or GE (Genetically Engineered) Although the term GE is more commonly used in Greenpeace publications, the two terms are often used interchangeably in general discussion of the issue. We choose to use the term GM for continuity in this report as this term appears in the European legislation and is more commonly used by the EU food and drink industry, as can be seen in the company statements.



executive summary

The EU, with its 455 million consumers¹, is one of the biggest food markets in the world in terms of value. Estimated food and drink sales in the enlarged European Union, Switzerland and Norway in 2002² reached the amount of 1 069 Billion Euros (1 thousand and 69 Billion Euros)

The company statements on which this report is based clearly demonstrate that this market is more or less completely closed to GM labelled food products.

Tables 1 and 2 in the following chapters summarise company policies and non-GM commitments of the top 30 retailers and of 30 top food and drink producers in Europe. The tables also list the company ranking, countries in which they operate, countries in which a non-GM commitment has been given and other relevant business information. Each table is preceded by a summary of the results and followed by a list of extracted quotes from each company.

In commonly known industry rankings, companies are listed according to their total sales. However, retailers and most food and drink producers not only produce and sell food and drink products, but also a variety of non-food products. In order to better reflect the importance of a given food producer or retailer for the European food market, we choose to rank the companies not according to their total sales but according to food and drink sales (for the food and drink producers) or according to grocery sales (for the retailers). The resulting rankings shown in the tables 1-3 therefore differ substantially from some other company rankings for retailers and food and drink producers.

The GMO policies of these companies, in their own words, clearly spell out a massive and growing international food industry rejection of GM ingredients. The rejection of GM food in Europe goes right across the industry, from food and drink manufacturers to retailers, and includes everything from snacks and ready meals to pet food and beer.

The combined total food and drink sales of the 49 companies with a stated non-GM policy in their main market or throughout the EU (27 retailers and 22 food and drink producers) amounts to 646 Billion Euros (Six Hundred and forty six Billion Euros), more than 60% of the total European food and drink sales of 1069 Billion Euros. Clearly a massive rejection of GM labelled food.

Many of these companies had already anticipated the latest EU labelling legislation and implemented appropriate non-GM policies prior to the introduction of the new labelling legislation in April 2004. Indeed, many companies have clearly had non-GM policies in place covering all potential GM ingredients, including e.g. vegetable oils and maize starch, as far back as 1999/2000 and earlier.

Since April 2004 when the new EU labelling legislation came into force Greenpeace "Gene Detectives" have been inspecting supermarket shelves and other food stores for GM labelled products in the EU member states. Until mid November 2004, some 77 GM labelled products have been found in ten of the 25 EU member states, most of them in the Netherlands, Czech Republic, Germany, France and Slovakia. Many of these products are either GM soya oil or imported products from the US, Canada, Japan and Korea, the latter ones not being more than "niche" products and already being phased-out by either retailers or importers. This shows that the labelling legislation is being effective and is forcing users to identify GM ingredients.

The enlargement of the EU means that GM labelling legislation now also applies to food products in the 10 new member states and it can be observed that many of the top ranked retailers have already or are in the process right now of implementing non-GM policies throughout the enlarged EU25. However there remains a lot of work to be done by many companies to bring their central and eastern European operations up to the same non-GM standard as their operations in the western European countries.

The EU labelling legislation on GMOs is also important as a global reference point, or global standard, for importers and trading companies who's products enter the expanded European Union. For companies doing business internationally, implementing a company-wide non-GM policy is a logical step in order to respond to consumer demand and to legislation in the many other countries and regions of the world that have labelling and other relevant GM legislation.

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To have a better idea of the wider market effect of the non-GM policies of the companies listed in the report, it is necessary to look at the overall list of countries in which the companies operate and in which they are also implementing or planning to implement a non-GM policy. Many of these companies also rank amongst the top food producers and retail businesses globally.

The vast majority of the retailers and food and drink companies covered in this report have a non-GM food policy and many have had this policy in place for a number of years. With estimated food and drink sales worth EUR 1.069 billion Europe, one of the worlds largest food markets, is firmly closed to GM labelled food, and there is nothing to indicate that this is likely to change any time soon.

The trend amongst European based companies is clearly towards implementing non-GM ingredients policies and where non-GM policies have already existed for many years there is evidence of the policy being extended internationally as part of a company wide commitment by an increasing number of companies.

Stakeholders in the food production chain whether they are farmers, importers and exporters of commodity crops, policy makers, investors or other food producers and retailers may want to take account of these strong market signals.

Written out 1 069 Billion Euros looks like:

1 069 000 000 000 Euros or one thousand and sixty nine Billion Euros
In other international currencies 1 069 Billion Euros looks like:

1 333 Billion US Dollars

738 Billion British Pounds

145 680 Billion Japanese Yen

10 383 Billion Hongkong Dollars

3 806 Billion Brazilian Real³

It is clearly a major market from which no company would sensibly choose to have its products rejected by using ingredients that require to be labelled as GM.

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I THE EU LABELLING SITUATION

After years of public debate of the issue, European consumers in their large majority continue to have an adverse attitude to GM food. It has been this rejection of GM food by a 'well informed' public that has led the food industry to exclude any GM ingredients that require labelling.

Since the 18th April 2004, the European Union's new (second phase) labelling and traceability legislation for genetically modified food, feed and ingredients apply. These new rules, which are amongst the strictest worldwide and apply to one of the worlds biggest food markets in terms of value, will have major repercussions on the marketability of food and feed products derived from genetically modified crops.

There are two major changes to the previous labelling provisions, which will affect more than 90 percent of all GM crop imports to the European Union;

1. the requirement to label all products derived from GM ingredients, irrespective whether or not GM DNA or proteins can be detected in the final product or not.

In the first phase of EU legislation GM labelling was only required where the DNA or protein of the GMO could be detected in the final product and the maximum threshold for GM contamination ("adventitious or technically unavoidable presence"), which was exempted from labelling requirements was 1%. Now, in the second phase of the EU legislation the contamination threshold has been lowered to 0.9%⁴ and all GM ingredients require to be labelled based on traceability systems and not only by GM testing.



2. the requirement to label genetically modified feed.

The second phase of the EU legislation requires all GM ingredients used in animal feed to be labeled but it does not require labelling of the end meat and dairy products from animals fed on GM feed. Putting in place feed labelling and traceability systems is a necessary first step to accurate labelling of the eggs, meat and dairy products but it does not in itself provide consumer choice. For a more detailed discussion see page 35 on GM animal feed.

According to the EU's traceability legislation, operators placing on the market an authorised GMO are obliged to inform in writing receiving operators about the fact that the product contains or consists or is produced from GMOs, and of the unique identifiers assigned to these GMOs. This information must be transmitted to any subsequent operator receiving the product. Records of any such transactions must be kept by the operators for a period of five years.

EXAMPLES OF GM-FOOD AND GM-FEED LABELLING

GMO TYPE	EXAMPLE	LABELLING REQUIRED ACCORDING TO THE FORMER EU LEGISLATION (NOVEL FOOD REGULATION 258/1997)	LABELLING REQUIRED ACCORDING TO NOVEL FOOD AND FEED REGULATION 1829/2003
GM plant	Chicory	Yes	Yes
GM seed	Maize seed	Yes	Yes
GM food	Maize, Soybean sprouts, Tomato	Yes	Yes
Food produced from GMOs	Maize flour	Yes	Yes
	Highly refined maize oil, soybean oil, rape seed oil	No	Yes
	Glucose syrup produced from maize starch	No	Yes
Food from animals fed on GM feed	Eggs, meat, milk	No	No
Food produced with the help of a GM enzyme	Bakery products produced with the help of amylase	No	No
GM Feed	Maize	Yes	Yes
Feed produced from a GMO	Corn gluten feed, Soybean meal	No	Yes
Feed additive produced from a GMO	Vitamin B2 (riboflavin)	No	Yes

BASED ON: “STATE OF PLAY ON GMO AUTHORIZATIONS UNDER EU LAW”, EU COMMISSION, MEMO/04/14, JANUARY 2004

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II SUMMARY OF THE TOP 30 EUROPEAN RETAILERS GM FOOD POLICIES

- * 27 of the 30 top retailers have a non-GM policy throughout the EU or in their main market where they make more than 80% of their sales.
- * 14 of these have a policy in all European countries where the company operates, of not selling, under their own brand name any products that would need to be labelled as "genetically modified"; Carrefour, Auchan, Sainsbury's, Safeway, Marks & Spencer, Coop Switzerland, Coop Italia, Migros, Big Food Group, Somerfield, Morrisons, Kesko, Boots, Coop UK.
- * A further 7 companies; Tesco, Rewe, Metro Group, Casino, Edeka, Schwarz group (Lidl), Tengelmann have given a non-GM-commitment for their own-brand products in their main markets, usually their home country, in Europe (where they make e.g. >80% of their sales).
- * 4 retailers; ITM in France, Wal-Mart in Germany, Aldi declared that they are striving for a GM-free standard but have not achieved this yet.
- * Louis Delhaize has a non-GM commitment in France and Belgium (although some questions remain unsolved regarding their Cora and Match brands in Belgium)
- * Coop Norden group of retailers has a non-GM policy (although the regulations in Norway have yet to change to equal the new EU legislation. See table and company reply for details).
- * Leclerc, did not reply to our inquiry, however according to Leclerc's website, the company gives a non-GM commitment for its own brands in France, the company's main market.
- * Système U did not reply to our inquiry.
- * Spanish retailer Mercadona did reply to our inquiry, as did their trade association (ASEDAS), but neither answered the questions about GM ingredients policy and use in their reply.
- * Netherlands based Royal Ahold (Albert Heijn) uses GM ingredients in some of its own brand products, but highlight in their reply that the use of these is diminishing.

analysis of results:

The total grocery sales of the top 30 retailers listed is, more or less: 500 Billion Euros.

The combined European grocery sales in 2003 of the 27 retailers with a stated non-GM policy in their main market or throughout the EU amounts to more than 456 Billion Euros⁵. This is over 91% of the grocery sales of the 30 top retailers in Europe and is over 42% of the total 1 069 Billion Euros of food and drink sales in Europe.

Most of these retailers have this policy now since many years and all have quality control testing and audit systems in place to identify and in the vast majority of cases to exclude GM ingredients.

Many retailers had already anticipated the latest EU labelling legislation and implemented non-GM policies prior to the introduction of the new labelling legislation in April 2004. Indeed many companies have clearly had non-GM policies in place covering all GM ingredients including vegetable oils and maize starch etc as far back as 1999/2000 and earlier (e.g. Carrefour, Auchan, Lidl, Sainsbury's, Big Food Group, Coop Italia, Marks & Spencer).

The number 1 ranked retailer in Europe, Carrefour (with approximately 57.500 million Euro grocery sales in Europe and more than 25.000 million Euro ahead of its nearest rival Tesco) has a policy of implementing a non-GM policy globally, acknowledging the different development of that policy within different countries. Carrefour's total global sales of 100.044 million Euro (not just grocery but all sales) and the range of countries in which it operates in Europe, Asia and South America is but one example of the wider potential market influence of the non-GM policies of the companies listed in the report.

Three retailers, Netherlands based Royal Ahold (Albert Heijn), Casino's subsidiary Laurus and Tesco in Czech Republic were found to be using GM labelled ingredients in their own brand products. Ahold sells 7 of the total 77 GM labelled foods under the Euroshopper and Albert Heijn brands found in our survey. Laurus were found to be selling 4 GM labelled own brand products under the "Golden Regen" brand, and for Tesco one own-brand product containing GM labelled soya oil was reported in Czech Republic.

It should be noted that retailer policies only apply to own brands and so the retailer may be selling GM labelled products manufactured by one of the food and drink producers (some have been, see chapter 6. Exceptions are Marks and Spencer who's stores are 100% own brand, all retailers in Austria and several of the top 30 retailers in the new EU member states (Metro in Hungary, Rewe in Czech Republic, Hungary and Slovakia, Tengelmann in Hungary and Slovakia, Schwarz Group in Poland, Spar in Czech Republic).

Many retailers are also currently in the process of implementing non-GM feed policies and some chose to highlight this in their statements. This issue is covered in more depth in chapter 10 "The GM animal feed issue in Europe".

Table 1 – ranking of the top european retailers by grocery sales in 2003

In table 1, the 30 top European retailers are ranked according to their grocery sales in Europe. This ranking is based on data provided by M+M Planet Retail for the year 2003⁶. M+M Planet Retail definition of "Europe" includes the EU25, Norway, Switzerland, Liechtenstein, Monaco, overseas territories, Russia, Ukraine and Belarus. Turkey and Georgia are not included.

Countries / regions for which a non-GM commitment is valid:

By the terms "EU" and "Europe", we understand the enlarged European Union of 25 member states. If a commitment is only given for the former EU of 15 member states, this is specifically mentioned in the tables or in the text. When a company gives a non-GM commitment for the whole of the company's operation, this is mentioned as such, without further specification of countries or regions.



TABLE 1: RANKING OF THE TOP EUROPEAN RETAILERS

RANK	COMPANY COUNTRY OF ORIGIN DOMESTIC SALES IN EUROPE	EUROPEAN GROCERY SALES UNDER THE COMPANY'S RETAIL BANNERS 2003 (MIO EUR)	BANNERS UNDER WHICH THE COMPANY OPERATES	REGIONS AND COUNTRIES WHERE THE COMPANY OPERATES	REGIONS/COUNTRIES IN EUROPE FOR WHICH GREENPEACE HAS RECEIVED A WRITTEN NON-GM COMMITMENT FROM THE COMPANY
1	Carrefour France 59,8 %	59.511	Carrefour, Champion, Dia, Ed, Prodirect, Promocash, 8 a huit, Proxi, Shopi, Norte, GB, GS, Puntocash, Marche Plus, Ooshop, Diperdj, Docks Market	EU25: Belgium, France, Greece, Italy, Portugal, Spain, Poland, Czech Rep., Slovakia other European countries: Switzerland Latin America: Argentina, Brazil, Colombia, Mexico Asia: Turkey, China, Indonesia, Japan, Korea, Malaysia, Thailand	Carrefour has given a non-GM commitment for all products sold in Europe under the "Carrefour" brand. According to its company statement, "Carrefour will continue this progressive approach in other countries where the group is present and for the other own brands."
2	Tesco UK 87,5 %	33.815	Tesco	EU25: UK, Ireland, Hungary, Czech Republic, Slovakia, Poland Asia: Turkey, Japan, Malaysia, South Korea, Taiwan, Thailand	Tesco has given a non-GM commitment for its own-brand products sold in the UK, the company's main market, as well as in Hungary.
3	Rewe Germany 71,4%	32.294	Rewe, HL, miniMAL, toom, Penny, Stuessgen, Otto Mess, KAFU, Globus, Kaufpark, Fegro/Selgros, Billa, Standa, Merkur, XXL, Mondo, Petz, emma	EU25: Austria, France, Germany, Italy, Czech Rep., Hungary, Poland, Slovakia other European countries: Switzerland, Bulgaria, Croatia, Romania other: Ukraine	Rewe has given a non-GM commitment for its own-brand products sold in the company's main market, Germany, as well as for own-brand products sold in France (Penny), Austria (Billa and Merkur), Czech Republic (Billa and Penny), Hungary (Penny) and Slovakia (Billa).
4	ITM (Intermarché les Mousquetaires) France 71,4%	29.713	Intermarché, Ecomarché, Netto, Le Relais des Mousquetaires	EU25: Germany, Belgium, France, Portugal, Poland other European countries: Bosnia, Romania	We received non-GM commitments for own-brand products from ITM's subsidiaries in Belgium, Germany and Poland. However, in France, ITM's biggest market, the company has only given a guarantee not to use any detectable GM ingredients and additives for its own-brand products. Regarding non- detectable ingredients produced outside Europe, the company stated in February 2004 not to be able to give a GM-free commitment yet, but to work to solve this problem within a year.
5	Metro Group Germany 53%	29.295	Metro, Makro, Real, Extra, Kaufhof	EU25: Austria, Belgium, Denmark, France, Germany, Greece, Italy, Netherlands, Portugal, Spain, UK, Czech	In Germany, Metro's main market, the company has given a non-GM commitment for its own-brand products of the

				Rep., Hungary, Poland, Slovakia other European countries: Bulgaria, Croatia, Romania Russia, Ukraine Africa: Morocco Asia: Turkey, China, India, Japan, Vietnam			Metro Group. We received also non-GM commitments from Metro in Denmark (for Cash&Carry), Italy, Austria (Metro Cash& Carry), Hungary (Metro Holding) and in Poland (only for subsidiary Real).
6	Aldi Germany 63%	28.093	Aldi, Hofer, Trader Joe's	EU 25: Austria, Belgium, Denmark, France, Germany, Ireland, Luxembourg, Netherlands, UK Australia North America: USA			Aldi has given non-GM commitments for its own-brand products in the UK, the Netherlands and in Austria. In Belgium and Germany, the company's main market, Aldi has not yet provided a clear non- GM commitment, but declared that they have "asked all suppliers, considering currently lacking scientific evidence for the harmlessness of GM food- and feedstuffs, to abandon GM ingredients in their delivered products as far as possible."
7	Schwarz Group Germany 66%	26.930	Lidl	EU25: Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Netherlands, Portugal, Spain, Sweden, UK, Czech Republic, Estonia, Hungary, Latvia, Poland, Slovakia other European countries: Switzerland, Bulgaria, Croatia, Norway			With the exception of Czech Republic, Lidl, one of the major discounters in Europe, has given a non-GM commitment for its own-brand products in all countries where the company was contacted by Greenpeace: Germany, France, Italy, Netherlands, Austria and Poland.
			Kaufland, Kaufmarkt, Handelshof	Germany, Czech Republic, Slovakia, Poland, Croatia			Kaufland in Germany, Czech Republic and Slovakia so far didn't give a non-GM commitment for own-brand products, but have declared that they are making efforts to achieve a non-GM standard. Only Kaufland in Poland has given a non-GM commitment.
8	Royal Ahold Netherlands 17%	25.443	Albert Heijn, Schuitema/C1000, Gall&Gall, Deli XL, ICA, MAXI, RIMI Stop & Shop, Giant-Landover, Tops, BI-LQ, Bruno's	EU25: Netherlands, Sweden, Denmark, Spain, Belgium, Czech Rep., Poland other European countries: Norway North America: USA			Greenpeace has contacted Ahold's subsidiaries in the Netherlands, Sweden, Czech Republic and Slovakia. None of the subsidiaries has given a non- GM commitment to Greenpeace.

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9	Edeka Germany 91,2%	24.842	Edeka, E-Center, Herkules, E- Neukauf, Reichelt, Delta, Allfrisch, Condi, Helco, Nanz, NP, Kondi, Treff, Diska, Delta, Baeckerbub, Mios, Union, Ego, Dixi, Comet, Preisgut, Preisfux, Adeg	EU 25: Austria, Denmark, France, Germany, Czech Republic, Poland	Edeka has given a non-GM commitment for its own-brand products in Germany, the retailers biggest market, as well as in Austria and in Czech Republic.
10	Casino France 82,7%	22.030	Geant, Franprix, Leader Price, Casino, Petit Casino, Eco Service, Vival, Spar, Smart & Final, Geant Polska, DT Casino	EU25: France, Netherlands, Poland North America: USA Latin America: Mexico, Argentina, Uruguay, Venezuela, Brazil, Colombia Asia: Thailand, Taiwan, Vietnam Africa: Mauritius, Madagascar	Casino has given a non-GM commitment for its own-brand products in France, the retailers biggest market. Also, Casino's subsidiary Laurus has given a non-GM commitment for its own-brand products in the Netherlands.
11	Auchan France 59,9%	20.796	Alcampo, Acima, Cityper, Apic, Atac, Auchan, Elea, Finiper, Jumbo, Pao de Azucar, Marjane, RT Mart, Save & Safe, SMA	EU25: France, Italy, Luxembourg, Portugal, Spain, Hungary, Poland Russia Africa: Morocco Asia: China, Taiwan Latin America: Argentina	Auchan has given a non-GM commitment for the Auchan- brand and "Pouce" (low price) products in France, Spain, Italy, Luxembourg and Hungary. In all countries where Auchan operates (except Russia), a non-GM policy has been adopted. However, in Morocco, Poland, Taiwan and China, Auchan declared that a non-GM supply cannot yet be guaranteed as controlling facilities are not yet in place.
12	Sainsbury's UK 100%	16.349	Sainsbury's, Shaw's	EU25: UK USA	Sainsbury's has given a non-GM commitment for its own-brand products in the UK, its only market in Europe.
13	Leclerc France 95,7%	16.329	Leclerc	EU25: France, Italy, Spain, Portugal, Poland, Slovenia other European countries: Croatia	According to Leclerc's website, the company gives a non-GM commitment for its products sold under the "Repère" brand in France, the company's main market. Leclerc has given a non- GM commitment for its own- brand products in Italy.

14	Wal-Mart USA 0%	16.011	Wal-Mart, ASDA	EU25: Germany, UK Latin America: Argentina, Brazil, Mexico, Puerto Rico North America: USA Asia: China, Japan, Korea	Wal-Mart has given a non-GM commitment for its own-brand products in the UK. In Germany, the company has only stated its intention to exclusively offer food that is free of genetically modified food ingredients and that does not contain any additives or flavours produced from GMOs. Wal-Mart in Germany declared its intention to continue to work on excluding GM ingredients in the future within the means available.
15	Système U France 100%	11.635	Marche U, Super U, Hyper U	EU25: France	Système U has not given a GM policy statement regarding its company policy on GMOs.
16	Safeways UK 100%	10.872	Safeways	EU25: UK	Safeways has given a non-GM commitment for its own-brand products in the UK, its only market in Europe.
17	Coop Norden Sweden 34%	10.649	Super Brugsen, Dagli'Brugsen, LokalBrugsen, Irma, Kvickly, Kvickly xtra, Fakta, Coop Marked, Coop Mega, Coop Obs!, Coop Obs! Bygg and Coop Prix, Coop Forum and Coop Konsum	EU25: Sweden, Denmark Other European countries: Norway	In a joint statement, the three Danish retailers Coop Danmark, Dansk Supermarked, De Samvirkende Købmænd have given a non-GM commitment for their own-brand products. Coop in Norway answered that "COOP is aware of new EU regulation. The regulation is not adopted in Norway, so old Norwegian rules will not change". The company "will continue to act according to the law".
18	Tengelmann Germany 77,2%	10.641	Plus, Zielpunkt, A&P, Kaiser's- Tengelmann, Interfrucht Cash&Carry	EU25: Austria, Germany, Portugal, Spain, Poland, Czech Rep., Hungary, Slovakia North America: USA, Canada	Tengelmann has given non-GM commitments in Germany (Plus, Kaiser's Tengelmann), Austria (Zielpunkt), Hungary (Interfrucht) and Slovakia (Interfrucht). Germany is Tengelmann's main market.
19	Coop Italia Italy 99,7%	9.405	Coop	EU25: Italy	Coop Italia has given a non-GM commitment for its own-brand products.
20	Coop Schweiz Switzerland 100%	7.886	Co op	Switzerland	Coop Schweiz has given a non- GM commitment for its own- brand products.

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21	Migros Switzerland 98,9%	7.143	Migros	Switzerland EU25: France, Germany	Migros has given a non-GM commitment for its own-brand products.
22	Big Food Group UK 99,6%	7.067	Iceland, Iceland Home Shopping, Booker Cash & Carry, Woodward Food Service	EU25: UK	Big Food Group has given a non- GM commitment for its own- brand products in the UK, its only market in Europe.
23	Louis Delhaize Belgium 15%	7.037	Cora, Match, Smatch, Profi	EU25: France, Belgium, Luxembourg, Hungary Other European countries: Romania	Louis Delhaize has given a non- GM commitment for own-brand products in France (Cora). In Belgium (Cora, Match) and Luxembourg (Cora, Match), the company's commitment is unclear, saying that "their suppliers have to present products made of GMO-free raw materials, additives and aromas." The question remained unsolved if Cora and Match also give a non-GM commitment for GMO- derived, undetectable ingredients.
24	Mercadona Spain 100%	6.484	Mercadona	EU25: Spain	Mercadona's GM policy remains unclear. The Spanish retailers federation ASEDAS replied on behalf of Mercadona, stating that ASEDAS does not communicate about GM policies of its individual members.
25	Somerfield UK 100%	6.395	Somerfield, Kwik Save, Somerfield	EU25: UK	Somerfield has given a non-GM commitment for its own-brand products in the UK, its only market in Europe.
26	Morrisons UK 100%	6.178	Morrisons	EU25: UK	Morrisons has given a non-GM commitment for its own-brand products in the UK, its only market in Europe.
27	Kesko Finland 92%	4.781	Kesko	EU25: Finland, Sweden, Lithuania, Latvia, Estonia	Kesko gives a non-GM commitment for its own brand products sold in all countries of operation

28	Marks & Spencer UK 100%	5.005	Marks & Spencer	EU25: UK, Ireland	Marks & Spencer has given a non-GM commitment for its own-brand products in the UK, its main market in Europe.
29	Boots UK 100%	4.152	Boots	EU25: UK Asia: Taiwan, Hong Kong, Thailand	Boots has given a non-GM commitment for its own-brand products in the UK, its only market in Europe.
30	Co-operative Group UK 100%	3.646	Market Town, Welcome	EU25: UK	Coop UK has given a non-GM commitment for its own-brand products in the UK, its only market in Europe.



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ii quotes from selected retailers

Carrefour France

Carrefour emphasize that their position on GMOs has been in place since 1997:

“These actions have since several years enabled the “Carrefour” branded products in Europe to profit from traceability, proving the protected origin of conventional raw materials. Thanks to this anticipation, we already have the elements in place to guarantee that products will not have to carry labels saying ‘contains GMOs’ or ‘produced from GMOs’. We will continue this progressive approach in other countries where the group is present, as well as for the other brands”. (Letter to Greenpeace France, May 2004)

REWE Zentral AG, Germany

“Furthermore, in these contracts [with own-brands producers] the use of genetically modified raw materials or ingredients is excluded. That is to say that these materials must not be used by the producer in the production of our own-brand products.

Compliance with our own-brand contracts is monitored by regular tests in the framework of our quality assurance procedures. Non-compliance with our contracts will have serious consequences up to discontinuation”. (Letter to Greenpeace Germany, March 2004)

Metro Group, Germany

Regarding whether or not they would require labelling any products as containing GM, the headquarters of the Metro Group Buying GmbH in Germany replied:

“All own-brand products have been produced without the use of genetically modified organisms (...)METRO Group’s own-brand products will, also after entry into force of these new regulations, [EC No. 1829/2003 and EC No. 1830/2003], not be marketed as labelled, because the normative conditions for labelling of the products distributed by our company are still not given according to the new legislation (...)”. (Letter to Greenpeace Germany, December 2003)

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In Denmark, Metro Cash and Carry were just completing their own survey of their suppliers when we contacted them. The company had started contacting suppliers in January 2004:

“The present status of replies – shortly before deadline – shows that 99.5% of our suppliers do not trade GMO products at all. The remaining 0.5% are the suppliers, who are still investigating the question and have asked for a little more time to give their answers”.

Casino /EMC Distribution, France

EMC Distribution is the France-based Casino Group’s central purchasing body. EMC Distribution has within its organisation a Quality Management team whose mission is to manage the quality of own-brand, ‘premier prix’ and imported products marketed by the Casino supermarkets. The policy in place is solely applicable at the level of ‘own brands’.

“Since the possibility of including genetically modified agricultural products in the European Food Industry has become known, the Casino Group has adopted a position of caution and has asked its suppliers to omit GMOs from its own brand products. Since 1997 the Casino Group has made considerable efforts to exclude GMOS and ingredients derived from them from its own brand products, namely:

- __Substitution, wherever possible, of ingredients liable to contain or originate from GMOs with other ingredients which are definitely free of them***
- __Discontinue the product when substitution is not possible***

At present CASINO can confirm there are no longer any of its own brand and products containing GMOs and/or ingredients, additives or flavourings derived from GMOs. This policy applies also to ‘premier prix’ products which are marketed under a CASINO trademark”. (letter to Greenpeace France Feb 2004).

Auchan, France

Auchan, with grocery sales in Europe of 20.796 million Euro and with global grocery sales in the region of 42.439 million Euro, is one of the major retailers worldwide. The reply from the French headquartered retailer highlights very well the international / global nature of the GMO issue and of the non-GM policies of multi-national food retailer and producers:

“In response to your enquiry about Auchan’s position on GMO internationally and in Europe I can supply you with the following information:

Each country is responsible for its own buying policy, as Auchan works in highly decentralized way. There is no manager responsible for buying internationally in the Auchan group.

With the exception of our most recent international venture, Russia, we have a non-GMO policy in all of the countries in which we operate. We can, however, place countries into two categories:

1) Those in which we have been operating for a long time where the buyers have more control, such as Spain, Portugal, Italy and Luxemburg. Since 1999 a strict non-GMO policy has been in operation for Auchan and Pouce (premiers prix) own brand products. These countries have introduced their non-GMO policies through their in-store offers and through supplier specifications. With the exception of Portugal, where our laboratories have only been open since 2003, the necessary testing takes place regularly. Portugal will start testing this year.

2) In countries in which we have started trading more recently, such as Hungary, Morocco, Poland, Taiwan, China and Russia, the situation varies. In Hungary and Morocco none of the products is produced locally, hence some Auchan / Premier Prix produce imported from France in non-GMO. In Poland the suppliers were informed of the non-GMO policy 8 months ago [from May 04] and are contractually obliged to respect it. However we are unable to enforce it effectively in Poland because of a lack of laboratory testing facilities.

In Taiwan, even though the local authorities and suppliers are not sensitive to the subject of non-GMO origin, Auchan has adopted a non-GMO policy (...) Similarly in China we have communicated our policy to our suppliers. However, as in Poland we cannot verify this ourselves. In Russia the first priority for us has been to establish a supply base, which was not in place 2 years ago when we started operations. Our non-GMO policy will not come into effect until the second stage, when we have established partnerships with suppliers and set up a means of testing.”

(Letter to Greenpeace May 2004)

Schwarz Group (Lidl), Germany

Lidl, one of the major discounters in Europe and a subsidiary of the Germany-based Schwarz Group, has since many years applied a non-GM production standard. The company has given non-GM commitments in Germany, France, Italy, Netherlands, Austria and Poland.

“For years, we have made arrangements with our suppliers that food products supplied to us do not contain, consist of or have been produced from genetically modified organisms, and are therefore not subject to any labelling requirements.

Within due diligence we can state from our part that our products neither contain genetically modified organisms nor raw materials from genetically modified plants. They are not subject to the respective EC regulations No. 1829/2003/EC and No. 1830/2003/EC.
(Letter to Greenpeace Germany, December 2003)

ITM, Kaufland and Wal-Mart belong to the group of retailers which have not yet given, for parts of their countries of operation, a non-GM commitment to Greenpeace. However, the three companies declared their intention to switch to a non-GM production standard.

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ITM (Intermarché les Mousquetaires)

“Since the end of 2000, in all our own brand products, we have used ingredients and additives free from traces of genetically modified DNA and proteins. (...)When our suppliers are not able to guarantee that ingredients or additives are free from GMOs, we substitute them with other ingredients.

(...)However, we cannot guarantee for the time being that ingredients or additives exempt from traces of genetically modified DNA and proteins are not produced from GMOs when they originate in non-European countries. We are currently working with our partners in industry and hope to be able to provide products without GMOs in accordance with the new legislation in a year from now”.
(Letter to Greenpeace France, February 2004).

Kaufland Warenhandel GmbH & Co. KG, Germany

Kaufland, a Schwarz Group subsidiary, confirmed in a reply to Greenpeace that they

“...cannot currently guarantee that our products contain neither GMOs nor raw materials from GM plants.” The company did though highlight that they “... are making efforts to achieve this standard”.
(Letter to Greenpeace Germany, November 2003)

Wal-Mart Germany:

The world's leading retailer Wal-Mart does not have a clearly defined GM policy: while the company declared a non-GM commitment in the UK, Wal-Mart Germany did not explicitly guarantee a non-GM standard for its products sold in Germany:

“As a matter of principle, Wal-Mart Germany is anxious to exclusively offer food which is free of genetically modified food ingredients and which does not contain any additives or flavourings derived from genetically modified organisms (...). We continue to work to exclude genetically modified ingredients in the future within the means available to us..”
(Letter to Greenpeace Germany, September 2003)

Louis Delhaize, Belgium

“CORA Group's position on GMOs”

“CORA is willing to ban the use of Genetically Modified Organisms in the manufacturing of its own brand products. Thus, since 1999, we have been working with all of our suppliers at substituting raw materials, additives and flavourings likely to contain GMOs with non-GE ingredients for already existing Cora brand products.

Today, CORA's policy is unchanged, and when we create new products, we ask to our bidding suppliers to have, in their specifications, products which raw materials, additives and flavourings are non GE. If this isn't the case, their offer is rejected”.
(Letter to Greenpeace Belgium April 2004)

Sainsbury's, UK

Since at least 2001, Sainsbury's has “...eliminated GM ingredients from all our own brand food, pet food and dietary supplements.” The company noted at the time that this involved “...over 4000 products and was achieved by replacing soya and maize ingredients with alternatives or using validated non-GM sources”.
(Various communications to Greenpeace UK).

The Big Food Group (Iceland), UK

Iceland Foods, the well-known UK subsidiary of the Big Food Group, was one of the first to remove GM ingredients:

“Iceland products have been made without GM ingredients since 1998 and our commitment to this policy remains. We monitor suppliers closely and regularly test both ingredients and products to ensure that they do not contain traces of GM material. We are committed to clearly labelling our produce and include the statement “Made with no GM ingredients” on all packaging”.
(Letter to Greenpeace UK, March 2004)



Somerfield, UK

UK retailer Somerfield summed up the degree to which its non-GM policy has by now been a long held position for EU consumers and for many food companies:

“Thank you for your letter of 3 February and with regard to the changes within EU food regulations. Our position has not changed as a result of this regulation. Our customers are still not interested in genetically modified foods or ingredients and therefore we are happy to continue to avoid the use of GM foods and ingredients under our own label”. (Letter to Greenpeace UK, February 2004)

Tengelmann (Kaiser's) AG

“Plus’ and Kaiser’s Tengelmann’s own-brands have up to now been produced without GMOs. For this reason, there neither was nor is any reason for special labelling of these articles. The renouncement of GMOs (including ingredients made from GMOs) has been agreed in writing with our own-brand suppliers since years.

As a matter of course, we will also responsibly apply and implement the new EU regulations in force, 1829/2003 and 1830/2003 about labelling and traceability of food produced from genetically modified organisms in our company. Even after entry into force of this new legislation, still none of our company’s own-brand products will be subject to labelling, as due to normative preconditions, still no labelling requirement on the part of the suppliers is given”.
(Letter to Greenpeace Jan 2004)

Migros, Switzerland

“Migros takes consumers’ concerns very seriously, and is renouncing the sale of genetically modified food products. (...) Migros guarantees not to sell any genetically modified vegetable products (fruit, vegetables, cereals), opting instead for conventional varieties (...)”

Regarding ingredients and additives produced from GMOs, Migros states that:

“where documented GMO-free sourcing or GMO content <1% can no longer be guaranteed, Migros will replace these products or ingredients (...)”

Migros further communicated to Greenpeace on the issue of GM Rice:

“...because for Migros it is clear, that no genetically engineered rice will be included in our range of goods...”

(Email and company guidelines sent to Greenpeace Aug 2004)

Coop Switzerland

(Coop guidelines: Genetic Engineering in Food and Feed – May 2003)

According to Coop’s Guidelines on “Genetic Engineering in Food and Nonfood”, “Coop own-brand food products do not contain any ingredients or additives obtained from genetically modified starting materials.”

In a letter to Greenpeace Switzerland in August 2004, the company further declared on the issue of genetically modified rice:

“If Thailand would plant genetically modified rice on a large scale in the future, we would have to rethink the procurement of rice from this region. Because consumers in Switzerland, and in Europe in general, are so sceptical, the commercialisation of genetically engineered rice is not realistic in the near future.”

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Coop Italia

Coop Italy has, already since 1998, decided not to use GMOs for the production of their own brands:

“Coop, already since 1998, is not using GMOs in their own brand products.

Coop guarantees on the productive process. Coop planned and built a system of guarantee that assure consumers about the absence of GE maize, GE soya and GE derivatives in the production of their own brand products. Based on this study and 3 years controls, guidelines for supplier's behaviour have been set up and became integral part of the supply contract through the Technical Specification and are binding for suppliers of Coop own brand products. Already during the planning stage of an own brand product this requirement must be fulfilled and it is considered, if the ingredient does not come from a safe source, its replacement or elimination. If the result of the planning stage is not adequate, the carrying out of the new product is abandoned.(...)” (Coop Italy policy on the use of GM in the field of agriculture and food, letter from Coop Italia to Greenpeace Italy, February 2004)

Kesko

Kesko, a Finland-based retailer, operating also in Sweden and the Baltic States, declared that ***“...no ingredients of genetically modified origin are allowed in Kesko Food's own branded products...”***.

(Letter to Greenpeace Denmark, March 2004, company policy can also be found on www.kesko.fi)

Marks and Spencer, UK

“In 1999 responding to consumer concerns Marks & Spencer announced that it would cease selling products containing GM ingredients and derivatives. As a 100% own brand company this policy covers all food and drink purchased at Marks & Spencer. This policy remains in place and confirm that Marks & Spencer will not be selling any GM labelled foodstuffs in 2004.”

(Letter to Greenpeace UK, February 2004)

Co-op UK

“Given our recent work with Greenpeace and our membership and customers, our aim is to maintain our existing policy of not using GM ingredients. (...) As such I can confirm that we do not intend to launch any products with GM labelling in 2004 (...)”

(Letter to Greenpeace UK, February 2004)

Royal Ahold, Netherlands

The company declared in a letter to Greenpeace Netherlands in March 2004:

“Albert Heijn takes a neutral position on the use of genetic modification of plant-like organisms”.

“As you may know, we have been applying the so-called “Origin labelling” since 2001. All ingredients of GMO-origin are stated on the label, irrespectively of whether genetic modification of protein or DNA was detectable.

This approach has resulted in a further decrease of the number of products with the GMO-statement; 2001: 14 products, 2002: 10 products, 2003: 5 products and February 2004: still only 3 products, namely Euroshopper low-fat margarine tub 500 grams, Euroshopper frying fat 500 grams and Albert Heijn maize bud oil 1 litre.

(A clear avoidance-driven behaviour for the statement of a GMO-guarantee can be observed amongst our suppliers)”.

Laurus (a subsidiary of Casino), Netherlands

“As Laurus Nederland BV, we conform completely to the basic considerations that have been drafted by our federation, the CBL (Centraal Bureau Levensmiddelenhandel), and we strive therefore to have all our so-called own brands or private labels (food and petfood) free from GMOs.

After a new inventory, partly due to your questions, we can tell you that at the moment we have approximately 5000 own brands (under the own brand names 'Edah', 'Super' and 'Konmar'). Off these, (...) 8 products aren't (yet) GMO-free. These 8 so called private label products belong to the so-called C-brand of Laurus under the name 'Interall'. Of these 8 not GMO-free products, 4 labels have been changed in the mean time in such a way that the presence of GMO ingredients is mentioned. Furthermore for 3, the labelling will be also modified or the concerned ingredients will be replaced by GMO-free ones. One of the 8 products will be phased out. In 2003 for that matter the number of not GMO-free products was 23 and thus there is a significant decrease.”

(analogous translation from letter to Greenpeace Netherlands, March 2004)

Retailers where Greenpeace “Gene Detectives” have found GM labelled products (not retailer own brand), include Auchan, Carrefour, Tesco, Leclerc, Casino, Sainsbury's, Kaufland (a Schwarz Group subsidiary), Albert Heijn (a Royal Ahold subsidiary), Penny (a Rewe subsidiary) and Delvita (a subsidiary of the Belgium-based Delhaize-le-Lion Group). After consumer protests, Auchan has subsequently removed the products in Luxembourg. In several other cases, the GM labelled product is being phased-out by the importer or by the producing companies.

Greenpeace does not have a current statement from three of the retailers ranked under the top 30 retailers (Mercadona, Leclerc, Système U). Greenpeace will continue to ask these companies to make a public statement. We note that Greenpeace “Gene Detectives” have not yet found any GM labelled products in these stores, which might indicate that these companies do have a non-GM policy, but we await a statement from the companies themselves to explain the situation in their own words!

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III SUMMARY OF 30 TOP EUROPEAN FOOD AND DRINK PRODUCERS GM FOOD POLICIES

Table 2 lists the top 20 food and drink producers in Europe according to FFT⁷, plus 10 other food and drink producers taken from the top 100 ranking but who have significant importance on both national and global food and drink markets.

The total annual sales for these 30 food and drink producers amount to approximately 250 Billion Euro or almost one quarter of the total food and drink sales in Europe in 2002. According to FFT's data, the total food and drink sales in Europe in 2002 amounted to 1 069 Billion Euro.

22 of the 30 top food and drink producer have a non-GM policy in their own brand products company wide or throughout the EU .

- * 22 out of the 30 companies have given a non-GM commitment throughout the enlarged European Union, including Nestlé, Unilever, Coca-Cola, Diageo, Kraft Foods (Altria), Masterfoods (Mars), Heineken, Barilla, Carlsberg, Dr. Oetker, Arla Foods, InBev (Interbrew), Heinz, Chiquita, Cirio del Monte, Orkla, Ferrero, Northern Foods, Eckes Granini, Bonduelle, Kellogg and McCain.
- * 13 of these 22 have given a company-wide non-GMO commitment, i.e. covering their global operations and not just their EU markets; Diageo, Heineken, Barilla, Carlsberg, Arla Foods, Dr. Oetker, Chiquita, Cirio del Monte, Orkla, Ferrero, Northern Foods, Eckes Granini, Bonduelle.
- * 9 of these 22 companies have a non-GM policy for the European market, but not on a worldwide scale; Nestlé, Unilever, Coca-Cola, Kraft Foods (Altria Group), Mars (Masterfoods), InBev (Interbrew), Heinz, Kellogg, McCain.
- * From 8 companies we received non-GM commitments in a number of European countries but not a clear commitment that this was in place throughout the EU25; PepsiCo, Scottish & Newcastle, Cadbury, Danish Crown, Danone, Sara Lee, Campbell Soup, Allied Domecq.

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The combined food and drink sales of the 22 food producer that gave a non-GM commitment for Europe amounts to 190 Billion Euros, which is 76% of the total food and drink sales of the 30 companies portrayed in this report and 17% of the total European food and drink sales in 2002.

The statements clearly show a massive rejection of GM ingredients across the top companies in the European food and drink sector, with every company surveyed having a non-GM policy in all or at least large parts of Europe. Greenpeace was surprised, pleasantly, by the relatively large number of companies who replied stating a company-wide commitment to using non-GM.

It should be well noted that company-wide non-GM policies apply everywhere not just in Europe so the market effect of the company policies, when they are applied, can be much greater. Such company wide policies also send a strong and important message to the rest of the market. There is no ambiguity when the policy is non-GM across all company operations in all countries.

The fact is that it makes good business sense for companies to have a non-GM policy internationally. Non-GM products are accepted in all markets and the consumer polls have been consistently showing high levels of consumer concern and rejection of GM food for many years now and not just in Europe.

Consumers however should note; that some companies, or some staff in some companies, remain in fact strong advocates and supporters of the use of GM food regardless of their own current company policy. Some companies have not introduced a non-GM policy because they want to; they have a non-GM policy because that is what their customers have demanded.

In some countries Greenpeace offices provide a 'shopping guide' to provide more information on food industry policies nationally (see page 42 - Links to Greenpeace consumer websites).

GM Feed: Although the European food and drink industry has firmly excluded GM food ingredients, GMOs are still widely used as feed for meat and dairy production. With only a few exceptions that we are aware of, the vast majority of the major European food producers do not guarantee the use of non-GM animal feed for the production of meat and dairy produce. Indeed it is well known that many millions of tons of GM soya and corn are being imported each year and used as animal feed in Europe. The issue of GM animal feed is covered in more detail on page 35 of this report.

Table 2 – ranking of top european food and drink producers by food and drink sales in 2002

Table 2 lists the top 20 food and drink producers in Europe according to FFT⁹, plus 10 other food and drink producers taken from the top 100 ranking but who have significant importance on the global food and drink market and from which we have a good overview of national/EU GM company policies (e.g. Kellogg, Heinz, McCain, Campbell, Chiquita)⁹.

This ranking is based on data provided by the Swiss market research institute "Food for Thought" (FFT) for the Top 100 European Food and Drink producers and their estimated food and drink sales in Europe for the year 2002. The data provided by FFT referred to the enlarged European Union EU25 plus Norway and Switzerland, excluding Estonia, Latvia, Lithuania, Slovenia, Malta and Cyprus.¹⁰

TABLE 2: RANKING OF THE TOP EUROPEAN FOOD AND DRINK PRODUCERS

RANK	COMPANY COUNTRY OF ORIGIN	ESTIMATED FOOD AND DRINK SALES IN 2002 IN EUROPE (MIO EURO)	MAJOR SUBSIDIARIES/BRANDS	COUNTRIES/REGIONS FOR WHICH GREENPEACE HAS RECEIVED A WRITTEN NON-GM COMMITMENT FROM THE COMPANY
1	Nestlé Switzerland	32.783	Nestlé, Alete, Aponti, Beba, Herta, Findus, Buitoni, Country, Maggi, Kit Kat, After Eight, Choco Crossies, Lion, Nesquik, Quality Street, Yes, Adler, Aero, After Eight, Bärenmarke, Chambourcy, LC1, Nestlé Chocolate Mousse, Nestlé Fruits, Nestlé Jacky, Rolo, Yaourt à la Grecque, Sveltesse, Mövenpick, Schöller, Eskimo Pie, Smarties, Thomy, Friskies, Felix, Matzinger, Nescafé, Nestea, Milo, Nescau, Nido, La Lechera, Carnation, Purina, Ralston Purina, Power Bar	Nestlé has given a non-GM commitment for Europe.
2	Unilever Group UK	28.861	Bestfoods, Knorr, Hellmann's, Calvé, Amora, Bertolli, Becel, Flora, Rama, Blue Band, Country Crock, Slim Fast, Cornetto, Magnum, Solero, Carte d'Or, Ben & Jerry's, Bird's Eye, Iglo, Unox, Zwan, Dextroenergen, Boursin, Bresso, Du Darfst, Effi, Bird's Eye Walls, Becel, Biskin, "I can't believe it's not butter", Lätta, Livio, Blue Band, Lipton, P'fanni, Royco, Unox, Mazola	Unilever has given a non-GM commitment for EU countries and Norway.
3	Coca-Cola Company USA	15.607	Coca Cola, Fanta, Sprite, Minute Maid, Canada Dry, Bacardi tropical fruit mixers	Coca-Cola has given a non-GM commitment for EU countries.
4	Danone France	12.266	Danone, LU, Bledina, Opavia, Vitalinea, Petits Gervais, Actimel, De Beulelaer, Griesson, Heudebert, Petit Beurre, Pim's, Prince, Obstgarten, Volvic, Evian	We received non-GM commitments from Danone subsidiaries in Austria, Belgium, Germany, Hungary and the UK. According to the policy statement on Danone's website, "the Group Danone has decided not to use GMOs in the products of the Group (...) in order to respond to consumer demand which is by a majority suspicious (...)".
5	Altria Group Inc./Kraft Foods USA	11.805	Kraft, Jacobs, Philadelphia, Carte noire, Gevalia, Jacques Vabre, El Caserio, Milka, Cote d'Or, Toblerone, Marabou, Daim, Miracoli, Lunchables, Bird's Custard, Dream Whip, Miracle Whip	Altria Group/Kraft Foods has given a non-GM commitment for Europe.
6	Diageo UK	10.401	Archers, Baileys, Captain Morgan, Cardhu, Guinness, J&B, Johnnie Walker, Moët & Chandon, Smirnoff, Baron Philippe, Black&White, Freixenet, José Cuervo, Tanqueray	Diageo has a worldwide policy of not using GMO ingredients for all its products.
7	Mars Inc / Masterfoods USA	10.343	Mars, Milky Way, Snickers, Twix, M&M's, Pedigree, Whiskas, Sheba, Cesar, Kitekat, Uncle Ben's, Suzi Wan, Balisto, Maltesers, Bounty	Masterfoods has given a non-GM commitment for EU countries as well as for future EU accession countries.

8	Heineken Netherlands	9.372	Heineken, Amstel. More brands can be found at www.heineken.com	Heineken has a worldwide policy of not using GMO raw materials for all its brands worldwide
9	Barilla Italy	8.599	Gran Milano, Kamps, Barilla, Mulino Bianco, Wasa, Grissini, Pavesi, Voiello, Tre Marie, Sanson, Panem, Golden Toast, Lieken Urkorn, Bakker Bart, Misko	Barilla has a worldwide policy of not using GMO ingredients for all its products.
10	PepsiCo USA	8.371	Frito-Lay, Pepsi Cola, Gatorade, Tropicana, Quaker, Smiths, Doritos, Lay's, Mirinda, 7UP, Loóza, Cheetos	We received non-GM commitments from PepsiCo subsidiaries in Germany, Belgium and Hungary. We also received a non-GM commitment from PepsiCo's subsidiary Quaker Foods, valid for Europe.
11	Scottish & Newcastle UK	8.316	Scottish Courage, Waverley, Beamish & Crawford, Brasseries Kronenbourg, Maes, Sociedade Central de Cervejas, Foster's, Sagres, Mythos, Strongbow, Grimbergen	We received a non-GM commitment from Scottish&Newcastle's belgium subsidiary Alken-Maes.
12	Cadbury Schweppes USA	7.547	Cadbury's, Schweppes	We received non-GM commitments from Cadbury's subsidiaries in France, UK and Poland as well as from Schweppes in Belgium.
13	Danish Crown Denmark	7.328	Tulip, ESS-FOOD, Emborg Foods, SFK Meat Systems, SFK Food, Scan-Hide, Raynal Petersen, Desff, Carnes Danesas	We received non-GM commitments from Danish Crown's Tulip subsidiaries in Germany, Austria and the UK.
14	Carlsberg Denmark	7.145	Carlsberg, Tuborg, regional brands: Okocim, Baltika, Pripps, Ringnes, Koff, Tetley's, Super Bock, Feldschlösschen	Carlsberg has a worldwide policy of not using GMO raw materials and technical aids for all brands owned by Carlsberg.
15	Oetker Germany	7.060	Dr.Oetker, Oetker, ancel, cameo, Vitalis, Ristorante, Culinaria, Intermezzo, Die Ofenfrische	Oetker has given a non-GM commitment for all companies within Oetker International
16	Sara Lee USA	6.973	Cherish, Milk Wala, Nutrine, Royal Marie, Sara Lee, Nobre, Tomten, Jimmy Dean, Nobre, Rudy's Farm, Natreen, Pickwick, Pastel, Pay, Eves, Sara Lee	We received non-GM commitments from Sara Lee in the UK and Hungary as well as from its subsidiary Natreen in Germany.
17	Arla Foods Denmark	6.928	Arla, Semper, A38, Adam, Apetina, B38, Billinge, Blanchmange, Blomst, Breight, Buko, Cheasy, Choco Mousse, Cultura, Danish Blue, Danish Mozzarella, Delikatess, Denmark, Eva, Fetina, Gaio, Harmonie, Höng, Kadett, Kaergården, Karolines, Klovborg, Lillebror, Lowey, Lurpak, Maelk Yoghurt, Magre, Malthé, MD, Meise, Milk Delight, Ostmästaren, Pizza Cheese, Power Cow, Puck, Riberhus, Rosenborg, Semper, Three Cows, Tuorejuusto, Verum, Ylette, Yoggi	Arla Foods has given a non-GM commitment for the whole group.

TABLE 2: RANKING OF THE TOP EUROPEAN FOOD AND DRINK PRODUCERS

RANK	COMPANY COUNTRY OF ORIGIN	ESTIMATED FOOD AND DRINK SALES IN 2002 IN EUROPE (MIO EURO)	MAJOR SUBSIDIARIES/BRANDS	COUNTRIES/REGIONS FOR WHICH GREENPEACE HAS RECEIVED A WRITTEN NON-GM COMMITMENT FROM THE COMPANY
18	InBev (formerly known as "Interbrew") Belgium	6.639	Hopfen König, Hougardse Das, Jingling, Julius, Jupiler, Kamenitza, Klinskoye, La Bécasse, Labatt Blue, Leffe, Niksico Pivo, OB Lager, Oranjeboom , Ozujsko Pivo, Piedboeuf, Stella Artois, Vieux Temps	InBev has given a non-GM commitment for all brands under the InBev portfolio for the European Union countries.
19	Allied Domecq UK	6.350	Ballantine's, Beefeater, Canadian Club, Courvoisier, Kahlua, Malibu, Sauza, Tia Maria, Clos du Bois Wines, Siglo Wines, Campo Viejo Wines, Mumm Champagne, Perrier Jouet Champagne, Dunkin' Donuts, Baskin Robbins, Togo's	Allied Domecq's GM policy is ambiguous: according to its corporate statement, Allied Domecq aims "to eliminate any usage of GM based material and to replace it, where practicable."
21	Heinz USA	5.444	Heinz, De Ruijter, Foodmark, HAK, Honig, Roosvicee, Serv-A-Portion, Sonnen Bassermann, Weight Watchers, Farley's, John West, Linda McCartney, Ross, San Marco, Guloso, Marie Elisabeth, Orlando, Petit Navire, Uncle Williams, Bi-Aglut, Dega, Dieterba, Fattoria Scaldasole, Mareblu, Nipiol, Ortobuono, Plasmon, Miedzychod, Pudliszki, Sunar, Sunarka, Wodzislaw	Heinz has given a non-GM commitment for Europe.
22	Chiquita USA	5.154	Chiquita	According to its company statement, Chiquita does not sell any genetically modified fresh fruits or vegetables worldwide. According to its 2000 corporate report, "we [Chiquita] also specify GM-free ingredients, such as starches and sugars, for use in processing our raw vegetable products. We market, however, a number of more highly formulated canned products such as soups, chilis and stews that contain seasonings or other minor ingredients that may have themselves been formulated from GM products."
26	Orkla Norway	4.294	Grandiosa, Stabburet, Nora, Idun, BigOne, Fun Light, Sunda, Nugatti, Chef, Felix, Bob, Onoe, Ekstroms, Abba, Jacky, Poltsamaa, Kotlin, Sorella, Felix Austria, Kung Gustaf, Bjellands, Woldemar, Marina, Ansiovis Original, Food Ingredients: Idun, Kaka, Odense, MaltCentralen, Dragsbae	Orkla has given a non-GM commitment for all its food producing companies.
31	Ferrero Italy	3.929	Duplo, Ferrero, Ferrero Rocher, Giotto, Hanuta, Kinder, Mon Chéri, Pocket Coffee, Prestige, Raffaello, Tic Tac, Kinder Fetta al Latte, Kinder Pingui, Nutella	Ferrero has adopted a non-GM policy for the whole group.

37	Northern Foods UK	3.459	Fox's, Paynes, Elkes Biscuits, Smith Flour Mills, Goodfella's , Donegal Catch	Northern Foods has given a non-GM commitment for all its products sold throughout Europe.
43	Eckes Germany	3.163	Granini, La Bamba, hohes C, Rea, Clippo, Dzien Dobry, Fruit Tiger, Siu, Suzi, Eckes, Dr.Koch, Fruchttiger, Tigro Fruit, Joker, Marli, Mehukatti, Ribb & Deckers, Trip, Tropic, Yo, Obi, Susi	Eckes has given a non-GM commitment which is valid for all its "strategic and international brands".
53	Cirio del Monte UK	2.789	Cirio del Monte	Cirio del Monte International gives a non-GM commitment for their products worldwide.
55	Bonduelle France	2.670	Bonduelle, Cassegrain, Frudesa	Bonduelle has given a non-GM commitment for all ingredients in all subsidiaries and brands in all countries.
65	Kellogg USA	2.110	Kellogg's	According to a statement from Kellogg's Germany, all products sold by Kellogg in Europe do not contain ingredients from genetically modified raw materials.
76	Campbell Soup USA	1.838	Campbell, Erasco, Heisse Tasse, Raguletto, Homepride, Liebig, Godiva, Oxo, McDonnells, Lesieur, Arnott's, V8, Prego, Pepperidge Farm, dL, Batchelors, IsoMitta, Touch of Taste, Royco	We received non-GM commitments from Campbell's in the UK and Germany.
77	McCain Canada	1.801	McCain	McCain has given a non-GM commitment for all products made and sold by McCain Continental Europe (which is Scandinavia, Netherlands, Germany, Austria, Switzerland, Belgium, Luxembourg, France, Spain, Portugal, Italy, Greece) as well as in the UK and in Slovakia.



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ii quotes from selected food and drink producers

Nestlé

In a letter to Greenpeace International, Nestlé declared that *“the new EU legislation on GMO food and feed does not impact the labelling of Nestlé products in Europe, since in response to the European consumer preferences, our ingredients are from non-GMO origin and traceability and quality systems are already in place. We use no genetically modified organisms, whether plant, animal or other organisms.”*

(Letter from Nestlé headquarters to Greenpeace International, June 17, 2004)

Unilever

In a letter to Greenpeace International, Unilever declared that *“in response to this consumer attitude Unilever strive to avoid the use of ingredients, derived from genetically modified raw materials, within the constraints of availability, functionality and costs of alternative ingredients.(...) When in future this policy can not be implemented or maintained, Unilever will inform the consumer by labelling its products in accordance with the new European Regulations 1829/2003 and 1830/2003 from 18 April 2004 onwards.”*

(Letter from Unilever Headquarters to Greenpeace International, 10 May 2004, regarding the company's policy for the EU25 member states).

Unilever has given separate non-GM commitments in most of the EU25 member states, e.g. Austria, Belgium, Czech Republic, Germany, Hungary, Italy, Poland, Slovakia, UK and the Nordic countries.

Coca-Cola

In a letter to Greenpeace International, Coca-Cola declared that *“in the countries of the European Union we do not use ingredients which are genetically modified or derived ingredients from genetically modified organisms.”*

(Letter from Coca-Cola Headquarters to Greenpeace International, 13 July 2004)

Danone

Greenpeace offices in Austria, Belgium, Czech Republic, Germany, Hungary and the UK received non-GM commitments from the national Danone subsidiaries. **On Danone's website (Aug 2004)**, the company declares that *“the Group Danone has decided not to use GMOs in the products of the Group (...) in order to respond to consumer demand which is by a majority suspicious (...)”.*

Kraft Foods (Altria Group)

In a statement sent to Greenpeace International in May 2004 from Kraft Foods Europe headquarters regarding its GM policy in Europe, Kraft Foods declared: *“(...) our decisions whether or not to allow the use of ingredients derived through biotechnology are made on a market-by-market basis considering national regulations, labelling requirements, ingredient availability and production location. In Europe, the regulatory situation continues to evolve across a broad range of countries in which we manufacture and market our products. Therefore, we have focused on establishing a comprehensive program to ensure that we continue to source only non-GM crop-based ingredients, including additives and flavours, for use in our products produced and sold in European countries. These ingredients are controlled through a system of supplier programs, certification and analysis. As a result, according to new EU legislation we do not have a requirement to label our products in respect of modern biotechnology.”*



Masterfoods (Mars)

Greenpeace received company statements from Masterfoods subsidiaries in Austria, Belgium, Czech Republic, France, Germany, Italy, Hungary, Slovakia and the UK. In all of these statements, Masterfoods guaranteed the use of non-GM ingredients and that the company supplies the ingredients from conventional cultures. **In a statement sent to Greenpeace International in May 2004 from Masterfoods headquarters**, the company declared that ***“the statements you have received from the Masterfoods units are valid for all countries whether it is for an old EU country (15), a new EU country (25) or an accession country (accession planned past 1 May, 2004).”***

Barilla

In the position of the Barilla Group from May 2004, Barilla declared: ***“When it comes to using genetically modified organisms (GMO’s) in the agricultural and food industry however, people are still concerned about the possible risks involved with this type of application, and are wondering just what sort of real opportunities do actually exist.***

Until more complete and convincing scientific data is available, Barilla has therefore decided to play it safe and refrain from the use of genetically modified ingredients, guaranteeing not to use GMO ingredients for all its products. This choice, which stems from our manufacturing strategy and is unrelated to any ideological commitments, has as its purpose to guarantee the quality of our products.

In order to achieve these objectives, Barilla has undertaken to adopt for all its products the European Regulations which, in regard to communication parameters, obligations and transparency, are the most strict and effective that exist today. In order to carry out this commitment, Barilla will apply rigorous procedures regarding the selection, purchase and management of the hundreds of raw materials used and the related production chains.”

Ferrero

In a statement sent to Greenpeace Belgium in March 2004, Ferrero declared ***“We confirm that the products marketed by our company neither contain ingredients nor additives containing or derived from genetically modified organisms, in the terms of the legislation relevant to this area. This is a decision which has been adopted by the Ferrero Group since several years and which translates into a rigorous selection of our suppliers and strict verification procedures through analytical testing. For any purpose, we would indicate to you that our position on this subject has already been officially communicated to other Greenpeace organisations in European and non- European countries.”***

Sara Lee

“For all her products Sara Lee strives after optimal quality and Sara Lee is committed to preserving her consumer’s trust. All our products comply with the legal requirements and regulations concerning genetic modification as these have been drawn up by the European, American (USDA, FDA and EPA) and national governments.

Naturally, this also entails that Sara Lee/ DE’s products - when these contain GMO ingredients - will be labelled in accordance with the EU Regulation 1830/ 2003 to inform our consumers”.

(letter to Greenpeace Netherlands March 2004)

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Heinz

“Heinz Europe remains committed to taking every possible step to ensure that Heinz varieties remain free from ingredients derived from genetically modified crops and this includes animals fed on GM crops.” (statement from February 2003, published on Heinz’ website). In a statement to Greenpeace Belgium, Heinz Northern Europe reemphasized this policy: ***“H.J.Heinz has a non-GMO policy, which states that H.J.Heinz does not use any ingredients from GM origin. H.J.Heinz remains committed to taking every possible step to ensure that H.J.Heinz varieties remain free from ingredients derived from genetically modified crops. Where there is the potential for GM material to be present, or where ingredients are derived from soya or maize, we source non-GM, identity preserved ingredients through carefully audited suppliers.”***

Chiquita International

“We do not sell any genetically modified bananas, nor do we market any other genetically modified fresh fruit or vegetables (...) While biotechnology holds some promise in eliminating the need for agrochemicals, it is a long-term, extremely expensive and uncertain proposition. Even if research in this field were successful, we estimate it would take 8-10 years to develop and test thoroughly. What’s more, even if the technology itself were successful, we would only introduce it if our customers and consumers had sufficient confidence in its health and safety”. (Letter to Greenpeace Jan 2004).

Eckes

In a letter sent to Greenpeace Germany in April 2003, the company declared: ***“we have documentation from all our suppliers to the effect that genetic engineering techniques and/or raw or technical aids produced using such techniques are not used for products supplied to us.”*** (original quote in German)

Eckes-Granini declared in a letter sent to Greenpeace Germany in May 2004, that this statement ***“applies analogously to our strategic and international brands within the Eckes-Granini group.”***

Bonduelle Group

“I confirm that Bonduelle don’t sell any GMO products, including ingredients, whatever the subsidiary (...) the country or the brand (company brands or client brands).” (Letter to Greenpeace Oct 2004)

Kellogg

Kellogg has given a non-GM commitment for the company’s products sold in Europe: ***“This commitment towards consumers is applied to the use of cereals as well as to other ingredients in Europe. Kellogg is aware of the European consumers’ opinion and therefore does not use genetically modified maize or soya ingredients respectively the derivatives thereof in breakfast cereals sold in Europe.”***

Concerning the maize used by Kellogg in Europe for breakfast cereals, a specifically in Argentina grown variety is used. We will continue to assure that it is of non-GM origin. All products sold by Kellogg in Europe do not contain any ingredients of genetically modified raw materials.” (Letter to Greenpeace Feb 2004)

McCain

In a letter to Greenpeace International, McCain declared: ***“(…) To follow this policy, we can certify, that all products made or sold by McCain in Continental Europe, don’t contain, as of present, any ingredients or additives deriving from Genetic Modified Organisms. In accordance with the European Regulations Nr 1829/2003 and 1830/2003, we don’t need GMO label for our products.”***

(Letter to Greenpeace International, 22 September 2004). Besides this guarantee for what McCain calls “Continental Europe” (EU15 and Switzerland, except UK), the company has given non-GM commitments as well for the UK and Slovakia.



drink manufacturers

Drinks manufacturers, including prominent beer manufacturers, have stated that they have non-GM policies. These examples show the position of some of the larger companies in the European industry. However, a more complete survey of the GM policy of popular beer, wine and spirits brands may be more useful for consumers. Greenpeace would be glad to partner with other organisations in producing such a survey or is happy to assist others by providing the information we already have.

Heineken

In a statement sent to Greenpeace Netherlands in May 2004 from Heineken International headquarters, Heineken declared: ***“Heineken does not use genetically modified (raw) materials for the production of beer...(.) Heineken selects its suppliers on the basis of “their” raw material supply, product quality, equipment and quality systems, and does this by means of audits and regular evaluations.***

Apart from the specifications Heineken has also laid down the monitoring systems with these raw material suppliers. Monitoring on GMOs takes place throughout the complete supply chain.” In the statement, Heineken declared also that none of its products need to be labelled according to the new EU GM legislation.

Carlsberg

In a statement sent to Greenpeace Belgium in March 2004 from Carlsberg headquarters in Denmark, Carlsberg declared: ***“Our policy – “GMO ingredients are not used in the production of the Carlsberg and Tuborg brands” – was communicated to all our subsidiaries May 2000. We strictly control that this policy is adhered to and we accept no minimal level for ingredients which have been genetically modified.”*** Carlsberg gave a further precision that ***“Carlsberg GMO policy covers all brands owned by Carlsberg which means the policy also covers local brands – i.e. they are produced without any use of genetically modified raw materials and technical aids.”***

InBev (formerly known as Interbrew)

In a statement issued September 2004 explained its policy: ***“InBev’s beers are produced from agricultural raw materials such as barley, wheat and hops. Currently, there is no commercially available genetically modified barley, wheat or hops. However, in some parts of the world GM maize is already on the market.***

In different markets such as Europe InBev has made contractual agreements with the maize suppliers to deliver only identity preserved (non-GM maize). In consequence, all InBev beers brewed in these countries do not contain genetically modified agricultural raw materials”.

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IV A TASTE OF COMPANY POLICY IN THE NEW EU MEMBER STATES

Since 1st May 2004, 10 new countries have joined the EU, and GM food now also requires to be labelled in Poland, Hungary, Czech Rep, Slovakia and the other new EU member states.

While Greenpeace has been aware of retailers and food producer's non-GM commitments in the EU15, the question remained open to what extent these companies would also commit to a non-GM food production in the new member states of the EU.

Greenpeace offices in Poland, Hungary, Czech Rep, Slovakia forwarded us the initial responses they have received from companies listed in this report to provide an taste of the food industry response in the new EU member states. Greenpeace offices in these countries will be following their contact with food companies nationally and some have already produced lists of food company policies in that country. See web links on page 42.

retailer policies in the new EU countries:

15 of the top 20 top ranked retailers operating in the new EU member states were contacted for this report. Our research was limited to the four major accession countries Poland, Hungary, Czech Republic and Slovakia (in the following text being referred to as "the four new member states"). Most of the retailers are only operating in a few of the four new member states, with only Metro, Tesco, Rewe, Tengelmann and Schwarz Group operating in all of these countries.

8 of the 15 retailers we contacted have a non-GM policy in their home country (Metro, Tesco, Rewe, Tengelmann, Spar Austria, Delhaize Group, Casino and Auchan). 4 companies (ITM, Leclerc, Carrefour, Louis Delhaize) have either declared to switch to a non-GM production or have made non-GM commitments for part of their operations (product range and/or countries of operation).

6 of 15 retailers contacted in the four new member states have given a non-GM commitment: Spar Austria, Delhaize (Delhaize-le-Lion Group), ITM, Auchan (for its "Auchan" and "Pouce" brands) and Carrefour (with the exception of their first price products). Rewe has given a non-GM commitment in Hungary, Czech Republic, Slovakia, but not in Poland.

Metro and Schwarz Group have given non-GM commitments only in some of the four new member states. Tengelmann's subsidiary Interfrucht has given a non GM-commitment in some of the accession countries, while its subsidiary Plus has not committed to a non-GM production in any of these countries.

Louis Delhaize in Hungary and Casino's Polish subsidiary Geant did not give a non-GM commitment.

Tesco has a non-GM policy in its home market UK and also in Hungary, but has not given a non-GM commitment in Poland, Czech Republic and Slovakia.

food and drink producer policies in the new EU countries:

It can be seen from the table2 column 5 – Countries/regions for which Greenpeace has received a written non-GM commitment from the company – that many companies have a company wide or Europe wide policy (including new members states) of not using GM ingredients.

However the detail on the ground can and does vary from the policy statements at times and there are still plenty of companies who have not yet made any public statement on the issue in the new member states in which they operate. Greenpeace will continue to investigate company policies in the region and to make its findings available publicly.

poland While there seems to be a trend that the major European food producers are committed to supply non-GM food to consumers in Poland, the Polish retail market remains divided regarding non-GM commitments.

The Polish retail market is very much dominated by international retailers, especially from Germany and France: Metro, Carrefour, Auchan, Casino, Rewe, Tengelmann, Leclerc, ITM as well as Dutch-based Ahold, UK-based Tesco and the Portuguese retailer Jerónimo Martins belong to the top 12 retailers in Poland¹¹. While Greenpeace in Poland received non-GM commitments from Real (Metro), Carrefour, Auchan and ITM, the following companies did not commit to a non-GM food supply: Metro Cash & Carry, Jerónimo Martins, Geant (Casino), Tesco and Plus (Tengelmann).

Major European food producers that have given a non-GM commitment to Greenpeace in Poland: Kraft, Cadbury, Ferrero, Heinz, Masterfoods (Mars), Nestlé, Dr. Oetker and Unilever.

hungary As in Poland, many major European food producers have given non-GM commitments to Greenpeace in Hungary, while the situation regarding the retailers' commitments is divided.

From the top 10 retailers¹² in Hungary, Metro, CBA Kereskedelmi, Tesco, Interfrucht (Tengelmann), Penny (Rewe) and Auchan have given a non-GM commitment. The following retailers did not commit to a non-GM food supply: CO-OP Hungary, Provera (Louis Delhaize), Plus (Tengelmann), Honiker (Hungary) and Reál Hungária. It is interesting to note that Tesco has given a non-GM commitment for its own brand products in Hungary, while denying this commitment to consumers in Poland, Czech Republic and Slovakia.

Major European food producers which have given a non-GM commitment to Greenpeace in Hungary: Masterfood (Mars), Unilever, Nestlé, Sara Lee, Dr. Oetker, Kraft Foods, Coca-Cola and Bonduelle.

czech republic Like in Poland, Hungary and Slovakia, the Czech retail sector is divided regarding non-GM commitments from the retail sector.

Major retailers¹³ which have given a non-GM commitment to Greenpeace: Rewe (Billa, Penny), Carrefour, Edeka, Unilever as well as Globus (Germany), Spar Ceska (Spar Austria), Julius Meinl (Austria) as well as the Czech retailers Hruska, Jednota S.D. and Spar Sumava.

Retailers which have not given a non-GM commitment in Czech Republic: Makro (Metro), Ahold, Kaufland (Schwarz Group), Tesco, Plus (Tengelmann), Delvita (Delhaize Group) as well as Coop Centrum, Jednota Opava, Jednota Fr_dek-Místek, Lekkerland, Lidl (Schwarz Group) and OK Trading. Both Ahold and Tesco are selling GM-labelled own-brand food products in their stores (see chapter 5).

Greenpeace received only few non-GM commitments from the major European food producers: Masterfood (Mars), Unilever, Opavia LU (Danone), Dr. Oetker and Bonduelle.

slovakia The Slovakian retail market is lead by the top European retailers Tesco, Metro, Billa (Rewe), Kaufland (Schwarz Group), Carrefour and Ahold¹⁴. While some the major European retailers and many of the smaller Slovakian companies have given non-GM commitments, four of the top 6 retailers in Slovakia did not commit to a non-GM food supply.

Retailers that have given a non-GM commitment: Carrefour, Billa (Rewe) and Delvita (Delhaize Group) well as many of the Slovakian retailers (M-Market, Prima Zdroj, Coop Jednota, Kon-Rad, Opal-Fytos, Rema 1000, Slovpos, Zdroj-Hos).

Retailers that have not given a non-GM commitment: Tesco, Metro, Kaufland (Schwarz Group) and Ahold as well as the Slovakian retailers Labas and Verex.

Many of the top European food producers did commit to a non-GM production: Unilever, Kraft Foods, Masterfoods (Mars), Coca-Cola, Pepsi-Cola, McCain, Bonduelle, Dr. Oetker and Chiquita.

conclusion

Many top ranked retailers have already or are in the process right now of implementing non-GM policies throughout the enlarged EU25, however there is obviously a lot of work to be done by many companies to bring their Central and Eastern European operations up to the same non-GM standard as operates in the western European countries.

Consumers in new EU countries would be well advised to continue putting pressure on local and international food companies to supply non-GM food and to ask them to make a clear statement of their GM position in each country.

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V GM INGREDIENTS EXPOSED BY NEW EU LABELLING LEGISLATION

Six months after the entry into force of the EU's new labelling and traceability legislation only a relative few products labelled as containing ingredients of GM origin were found on the European market.

Since 18 April 2004, Greenpeace "Gene Detectives" have been inspecting supermarket shelves and other food stores for GM labelled products in almost all EU member states. GM food produced after the 18th of April 2004 needs to be labelled according to the new EU legislation 1829/2003. Food produced from GMOs or GM ingredients might take some time to arrive in shops and onto shelves, depending on their 'production cycle'. This could theoretically mean that more GM labelled products might show up in the next months.

Until mid November 2004, 77 GM labelled products have been found in ten of the 25 EU member states, most of them in the Netherlands, Czech Republic, France, Germany and Slovakia. The most recent overview of GM labelled products in the 25 EU member states can be found at the Greenpeace "Trolley Watch" website www.greenpeace/stopGMO.

Although the list of labelled products appears to be long, it can be concluded that

- * Many of the labelled products are "niche" products that do not appear in huge volumes on the market and only have minor brand recognition.
- * 32 out of the 77 labelled products are imported products from the US, Canada, Japan and Korea
- * Due to consumer protest, already 21 of the 77 GM labelled products have been removed or are in the process of being removed from the shelves in France, Luxembourg, Belgium, Netherlands, Germany, Denmark and Slovakia.

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The list of GM labelled products contains quite a number of GM soya oils (as well as GM soya containing margarine products), especially in Czech Republic, the Netherlands, France, Slovakia and Germany. Several of these GM soya oils are cheaper price products and, as it is the case in France and Germany, are not sold in large quantities.

GM labelled ingredients were found in one or more own brand products of 3 retailers:

- * Dutch-based Ahold, which sells GM-labelled own brand products under the Euroshopper and Albert Heijn brands in the Netherlands, Czech Republic and Slovakia
- * Laurus, the Dutch subsidiary of the French retailer Casino, which was selling four labelled products under its "Golden Regen" brand
- * Tesco, which was selling a GM labelled soya oil under the Tesco brand in Czech Republic

Royal Ahold (Albert Heijn) and Laurus acknowledged the fact that they currently sell GM labelled food products, but that the amount of labelled products is in decline. See quotes in retailer section.

With both Laurus and Tesco we understand that the products have possibly been withdrawn or reformulated by the companies and we are following up directly with the companies to clarify.

GM-labelled own brand products under the Euroshopper and Albert Heijn brands of Royal Ahold in the Netherlands, Czech Republic and Slovakia however remain on sale and Royal Ahold look like remaining the last bastions of GM labelled ingredients in any European retailer own brand.

At least now Albert Heijn shoppers will be better informed about which products it is they should avoid when they do not want to eat GM food or to support the GM industry.

Namely: Euroshopper low-fat margarine tub 500 grams, Euroshopper frying fat 500 grams and Albert Heijn maize bud oil 1 litre





VI THE GM ANIMAL FEED ISSUE IN EUROPE

While the European food market remains closed for GMOs as direct food ingredients, retailers, food producers and the meat and dairy sectors continue to use GM soya and maize compounds as animal feed for poultry, pigs, cows and farmed fish. For 2002, total quantities for soya and maize imported into the EU were estimated at 36.6 million tons for soya and 6.8 million tons for maize (maize and corn gluten feed).

In Europe, most of the soya and maize is not directly used for food production, but enters the food chain through the stomachs of millions of farm animals: in 2002/2003, an estimated 92% of the soya and 75% of the maize were used as animal feed compounds, e.g. soybean meal, soya oil or maize gluten feed. An estimated 75% of the soya used as animal feed is derived from GM soya.¹⁵

The new EU regulations on labelling and traceability of GM food and feed (EC 1829/2003 and EC 1830/2003) mean that GM crops used as animal feed will now for the first time require to be labelled as GM. However, and in contradiction to the EU-Commissions ambitions to guarantee European consumers the “informed choice”, the concept of “farm to fork” traceability” gets interrupted at the farm gate. Even with the new legislation, GM crops are still being widely used as animal feed, but the dairy and meat products do not need to be GM labelled, denying the consumer the right to say ‘no’ when it comes to meat and dairy products from GM fed animals.

In the future, labelling of meat and dairy products from animals fed on GM crops will become much easier because once the current ‘new’ GM labelling and traceability regulations are being properly implemented, all players in the food chain; farmers, feed compounders, meat and dairy companies, and thereby also food retailers and producers, will by law have systems in place that allow all of them to know whether or not the animals have been eating GM crops.

Companies should even be able to know which specific GM crops and more or less what quantity of GM feed the animal has been eating. So there will be little excuse left for not informing the final end user, the consumer. In the future meat and dairy produce could and should be labelled based upon traceability systems, according to the direction of European food policy generally.

In the meantime despite scientific uncertainties and concerns around the effect of using GM crops as animal feed and despite continued consumer demand for non-GM food, there are millions of tons of GM crops imported and used as animal feed and there is no labelling of GM meat and dairy products to allow consumer choice.

In the light of this situation Greenpeace has been campaigning strongly during the last years to highlight the use of GM Feed in Europe and to highlight the alternatives to GM feed.

Some companies have given details of their GM feed policy when replying to us and these can be seen in the company statements, which are also available on our website.

From the replies that we have received it can be seen that;

Retailers have clearly taken the lead in responding to consumer demand and implementing non-GM feed policies. There is a clearly stated commitment by some to steadily work on sector after sector to ensure their entire range of meat and dairy products is sourced from animals fed only non-GM feed.

However with a few exceptions, the majority of the major European food producers DO NOT guarantee the use of non-GM animal feed for the production of meat and dairy produce.

For updated information on the Greenpeace campaign against GM animal feed in Europe and for further links on the issue, see: www.greenpeace.org

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VII COMPANY POLICIES IN A GLOBAL CONTEXT

For companies doing business internationally, implementing a company wide non-GM policy can be a logical step in order to respond to consumer demand and to legislation in the many other countries and regions of the world that have labelling and other relevant GM legislation¹⁶.

The EU labelling legislation on GMOs is important as a global reference point, or global standard, for importers and trading companies who's products enter the new expanded EU. Many European based manufacturers are also finding themselves to have a market advantage from the fact that they are exporting non-GM food products to countries all around the region and around the world as they supply subsidiaries from facilities based in Europe. When the product meets the new EU standard it is acceptable almost anywhere in the world even as regulations in other regions and countries are developing.

i global rankings for retailers - table 3 in the annex

In order to allow a comparison of the importance of the top retailers in Europe with the top retailers globally, we compiled, in analogy to the ranking of the top European retailers, a ranking for the top global retailers, ranked according to their grocery sales under the company's retail banners.

Data for this ranking was based on the rankings of M+M Planet Retail for the top global retailers¹⁷ and the top European retailers¹⁸ for the year 2003. The resulting ranking can be found in annex 1.

- * 20 of the retailers listed in this report are ranked in the top 30 retailers globally by grocery sales. 15 of these are ranked in the top 20 and 8 in the top 10 globally (Wal-Mart, Carrefour, Royal Ahold, Tesco, Rewe, Aldi, Metro Group, Casino, ITM, Schwarz Group (Lidl and Kaufland), Edeka, Auchan, Sainsbury's, Tengelmann, Leclerc, Delhaize Group, Système U, Safeway UK, Coop Norden, Coop Italia).

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Of these 20:

- * 5 of these companies have a non-GM policy in all European countries (Carrefour, Auchan, Sainsbury's, Safeway UK, Coop Italia).
- * 9 have a non-GM policy in their main markets, usually their home country where they make e.g. >80% of their sales (Tesco, Rewe, Metro Group, Casino, Edeka, Schwarz Group, Tengelmann, Louis Delhaize Group, Coop Norden).
- * 3 retailers have declared that they are striving to implement a non-GM policy in several EU countries (Wal-Mart, ITM, Aldi).
- * Leclerc, did not reply to our inquiry, however according to Leclerc's website, the company gives a non-GM commitment for its own brands in France, the company's main market.
- * Système U did not reply to our inquiry.
- * 1 retailer uses GM ingredients in their own brands but emphasises that the numbers of these are low and dropping (Royal Ahold).

The remaining 10 top global retailers who were not surveyed for this report are:

- * 6 US based retailers (Kroger, Safeway USA, Costco, Albertsons, Walgreens and Target)
- * 2 Japan based retailers (Ito-Yokado and AEON)
- * 1 Australia based (Coles Myer) and 1 Canada based retailer (Loblaws)

conclusion

14 of the top 30 global retailer having a non-GM policy in all European countries, in their main markets, where they make more than 80% of their sales and others are striving to achieve a non-GM standard. The total sales of the 14 at 356 Billion Euros represents over 43% of the total 818 Billion Euros grocery sales of the top 30 global retailers.

ii global ranking for food and drink producers - see annex 2

In order to allow a comparison of the GM policies of the top food and drink producers in Europe and worldwide, we choose a ranking according to the food and drink sales of the top global food and drink producers, provided by Leatherhead Food International¹⁹. Data about the top global food and drink producers can be found in annex 2.

15 of the leading European food and drink producers portrayed in this report rank among the 30 top food and drink producers worldwide²⁰. From these 15 companies, 11 companies have given a non-GM-commitment for all their brands in Europe: Nestlé, Kraft Foods, Unilever, Coca-Cola, Mars (Masterfoods), Heineken, InBev (Interbrew), Diageo, Danone, HJ Heinz and Kellogg. From the remaining 4 companies (PepsiCo, Sara Lee, Cadbury Schweppes and Campbell Soup), we received non-GM commitments from several of their European subsidiaries (for further details, see table 2).

The other 15 top ranked food and drink producers who were not surveyed for this report are:

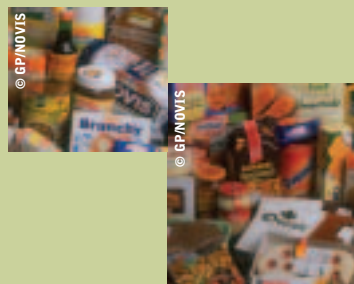
8 US-based food companies (ConAgra, Tyson Foods, Cargill, Archer Daniel Midlands, Anheuser-Busch, Sara Lee and General Mills, Dairy Farmers of America), 6 Japanese-based companies (Kirin Brewery, Asahi Breweries, Snow Brand Milk Company, Nippon Meat Packers, Suntory and Maruha) as well as the Italian-based dairy company Parmalat.

conclusion

The companies who have non-GM policies in place in one or more European countries, or indeed throughout Europe, are equally capable of implementing non-GM policies in every other country in which they operate. Yes of course there are differing regulatory systems and differing problems to be solved regarding how to ensure the ingredient supply is adequate and can be adequately monitored in different countries or regions. It took companies a number of years, e.g. 3 to 4 years, to implement their non-GM ingredients policies in Europe and so it will take some time also in other countries and regions.

And when 15 of these top ranked food and drink companies can achieve a non-GM standard then so too are each of the other top food and drink producers equally capable of meeting that standard. As we have witnessed in Europe, it is a matter of willingness not ability or cost or technical difficulty. Each of these companies can, many already do, supply non-GM food ... if they were willing to do so.

Implementing a non-GM ingredient policy company wide, especially when that includes the US market will take time, years in fact. The sooner that all of these companies make a start by publicly committing themselves to a policy which expresses non-GM as their aim and the sooner they start specifying non-GM ingredients in all future contracts with their suppliers then the better it will be for them, for their customers and better for the environment.



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VIII THE RELEVANCE OF RETAILER AND FOOD PRODUCER POLICIES IN EUROPE FOR CONSUMERS IN CANADA AND THE USA

Global food producers certainly face many challenges in establishing their global policy on GM food. In many regions/countries the challenge is to label GM ingredients or to source non-GM ingredients, but in the US and Canada, two of the four main countries in the world growing GM food crops on a commercial basis, the battle the companies are fighting is one to prevent GM labelling and to obstruct the right of consumers to know when GM ingredients are being used.

When being told by US politicians that Canadian and US consumers have been eating GM food for 8 years now and they are not complaining; it must be remembered that most Canadian and US citizens do not even know that they are eating GM food because it does not have to be labelled and some global food companies are fighting to keep it that way.

Global food producers, including Nestlé, Unilever, Coca-Cola and Mars (Masterfoods), through their trade association, Grocery Manufacturers of America (GMA), regularly attack all consumer and political efforts to introduce labelling of GM ingredients in the US.²¹

These companies are able to meet GM labelling requirements throughout Europe and in many other countries, but claim that it would be technically impossible or prohibitively expensive for them to label GM foods in the US and Canada and in other countries where they also resist GM labelling legislation.

Is labelling of GM ingredients technically possible? – Yes!

These international and global food producers have at least 4-5 years experience of dealing with GM crops in Europe and they know very well that they can detect and label GM foods. As they say themselves in the many statements, they do it regularly already in 15-25 countries or more.

Is Labelling of GM ingredients prohibitively expensive? – No!

The argument about cost of GM labelling is equally untrue, as everyone in the industry knows very well and as has been demonstrated in Europe. Testing of ingredients to prove GM use takes some work by companies but can be done as part of regular quality control efforts and for the actual labels the changes are made at the next print run and can be phased in over 6-12 months, so costs are minimal. This applies regardless of whether companies are based in Europe, Canada, the US or almost anywhere else in the world.

It is understood that some companies have in fact already taken the policy decision to source non-GM ingredients in some or all of their products in Canada and the US. This 'precautionary measure' has apparently focused first on more popular or sensitive brands. It is also understood that some leading food companies have become rather disillusioned with the failed promises of the GM industry.

After 8 years of defending GM ingredients and of having to deal with the problems of legislation, consumer concern and specific incidences of contamination, e.g. Starlink maize, the industry is still waiting for the much promised '2nd generation' of GM crops. These are the crops that come with the promise of health benefits, better taste or more nutrients that can be sold at a premium, or that have retailer/producer benefits such as longer shelf life. However, after 8 years these are still nowhere near the market and indeed when one looks at GM seed development pipelines e.g. for Monsanto, the trend appears to be towards soya and maize genetically engineered to provide nutritional changes in animal feed and not towards products with retail benefits.

There is also the very worrying aspect of genetic engineering research that has, correctly if belatedly, started to concern the US food industry, the open air planting of crops genetically engineered to produce pharmaceuticals or industrial chemicals, the so-called GM pharma crops. A case of so-called GM pharma crops by a company called Prodigene contaminating non-GM crops in the US in 2002 seem to have first stirred the industry²². In this case, GM pharma maize engineered to produce a protein for pig vaccination contaminated a silo with 500.000 bushels of soya that had to be destroyed.

The concern of the food industry is clearly that they will be the ones who have to deal with the product recalls, the loss of brand image and who will probably also have to pick up the bill when e.g. the GM pharma maize ends up in the nations cornflakes...or its exports. GM pharma crops grown in the US are not just a concern in North America; they are a concern for every country that imports maize or soya or any other food crop used for GM pharma crops from the US. For more info read the recent report, 'A Growing Concern' from the US based Union of Concerned Scientists - www.ucsusa.org

The food industry is well aware that once a GM crop is released into the environment nobody can stop the genes from flowing; seeds will spill, wind will blow, birds and bees will come and go and the pharmaceutical genes will travel...and potentially they will end up, illegally, without safety clearance and potentially hazardously, in human food products sold in and/or exported from the US. The US food industry has good reason to be concerned.

made in the US, labelled as GM, exported to europe for sale!!.. but not available in the US!!

Exporters from Canada and US increasingly have to label for the global market, with GM labelling now compulsory in e.g. Europe (25), Australia, New Zealand, Brazil, China, Japan and Russia. They can be exporting to these markets only one of two categories of food product, non-GM products or products labelled as containing GM.

Greenpeace 'Gene-detectives' have found a number of such products, often for niche products, in European stores between April and November 2005. Food products, manufactured in the US in which the ingredients are checked and labelled according to the new EU standards which are then labelled as containing GM ingredients and are shipped over to Europe for sale

This raises a number of points:

- * If the companies are exporting non-GM products, then they have no excuse for not providing non-GM products in Canada and the US.
- * If the company is exporting GM labelled products, then they must already have the GM label, printed and in use, for the export line, while the exact same product with the exact same ingredients will be sold to Canadian and US consumers without the GM label.

What European retailer and food producer policies means for consumers in Canada and the USA is that they provide clear evidence of company double standards by many food producers and clear evidence of the fact that these companies are perfectly able to label GM ingredients, or to exclude GM ingredients, when they choose to do so. When it is possible to identify and label GM ingredients on products made in the US and exported to Europe, and still make a profit, then it is clearly possible to do the same within the US and Canada.

Instead of campaigning for a ban on GM labelling in an effort to hide the GM contamination from consumers, the members of the Grocery Manufacturers of America (GMA) trade association and the rest of the US food industry should be implementing GM labelling, excluding GM ingredients and preferably campaigning for a ban on the release of GM crops to the environment in the interest of food and environmental safety, and in their own interest.

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background information concerning the grocery manufacturers of america (GMA)

The following information was copied by Greenpeace from GMA website in June 04 www.gmabrands.com

More information about GMA is available from the GMA and its member companies directly.

The following companies listed in the EU food industry market report are members of GMA;

Campbell Soup, Coca-Cola, Kellogg, Mars (Masterfoods), Nestle USA, PepsiCo, Sara Lee, Unilever

recent testimony, comments, correspondence and press releases:

The following example of headlines copied from GMA website do we think give a brief but accurate reflection of the activities of the GMA, which we can only presume are supported by its members. Full copies of this and a great deal more GMA correspondence is openly available on the trade associations website.

11/25/03 Letter to U.S. Trade Representative Requesting Action Against EU Labeling and Traceability Program

11/25/03 European Union Biotech Labeling Regulations A Barrier to Trade, says GMA

07/22/03 Press Release: GMA Says Biotech Traceability, Labeling Rule will Inhibit Trade

05/09/03 Press Release: GMA Comments on USDA Bio-Pharma Permit Regulations

05/05/03 GMA Comments to USDA on Bio-Pharma Permit Regulations

03/10/03 GMA Testimony in Opposition to Connecticut Biotech Food Labeling Bill

03/06/03 USDA Bio-Pharma Permit Changes Only a First Step

02/06/03 Food Industry Comments on Proposed FDA Regulations for Plant-Made Pharmaceuticals

02/06/03 GMA Says Stringent FDA AND USDA BIO-PHARMA Regs Needed to Maintain Food Supply Purity

11/21/02 GMA Urges USDA Leadership to Implement Stronger Bio-Pharmaceutical Regulations

11/14/02 GMA Urges the Use of Non-Food Crops for Biotech Drugs

11/06/02 Oregonians Reject Mandatory Biotech Labeling

03/25/02 GMA Letter of Opposition to Mandatory Rhode Island rBST Labeling Bill

03/12/02 GMA Letter of Opposition to Rhode Island rBST Reporting Bill

02/05/02 GMA Letter of Opposition to Hawaii Biotech-Free Food Labeling Bill

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REFERENCES

references

- 1 | EU enlargement, The new EU of 25 compared to EU15 – Eurostat news release 11/3/2004, <http://europa.eu.int/comm/eurostat/Public/dashop/print-product/EN?catalogue=Eurostat&product=1-11032004-EN-AP-EN&type=pdf>
- 2 | The Top-100 EU-19 Food & Drink Companies, Food for Thought (FFT), Geneva, company ranking provided to Greenpeace International, April 2004
- 3 | exchange rates from 17 October 2004
- 4 | This percentage refers to each individual ingredient in a product. The 0.9 % threshold only applies to GMOs which are approved under the Food and Feed Regulation and in accordance with Directive 2001/18 on the deliberate release of GMOs into the environment. A three year transitional exemption is made for a few GMOs, which are not approved but have benefited from a favourable opinion of the EU Scientific Committee(s) before this regulation entered into force. Such GMOs may be accidentally present up to 0.5%.
- 5 | Note: grocery sales of the Schwarz Group subsidiary Lidl are not included, as no detailed grocery sales figures for Lidl were available
- 6 | based on: M+M Planet Retail company ranking on top European retailers, unpublished, May 2003; and Top 30 Grocery Retailers in Europe, 2003, M+M Planet Retail, June, 2004, <http://www.planetretail.net/Home/PressReleases/PressRelease.asp?PRID=19575>. The ranking includes figures for the companies' net sales (in million Euro), retail banner sales (in million Euro), grocery sales (in percent) and domestic sales (in percent), in Europe for the year 2003.
- 7 | FFT's estimated food and drink sales refer to total human consumption of food & drink, including retail, foodservice and artisanal (own-produced for own-sale, e.g. bakers), with retail values calculated at retail prices, including VAT, excise and other sales taxes, and foodservice values at foodservice buy-in. FFT data cover both brand production as well as own label production for retailers. In practice, virtually all brand producers also produce for own label, although this is much more difficult to track. FFT figures therefore are estimates of total food & drink sales turnover for a company from e.g. company annual reports (and other sources), but a brand/own label split within that figure is not possible.
- 8 | FFT's estimated food and drink sales refer to total human consumption of food & drink, including retail, foodservice and artisanal (own-produced for own-sale, e.g. bakers), with retail values calculated at retail prices, including VAT, excise and other sales taxes, and foodservice values at foodservice buy-in. FFT data cover both brand production as well as own label production for retailers. In practice, virtually all brand producers also produce for own label, although this is much more difficult to track. FFT figures therefore are estimates of total food & drink sales turnover for a company from e.g. company annual reports (and other sources), but a brand/own label split within that figure is not possible.
- 9 | Source: Leatherhead International, in: "Big deals are out", Food Engineering & Ingredients, June 2003
- 10 | The Top-100 EU-19 Food & Drink Companies, Food for Thought (FFT), Geneva, 2004, for Greenpeace International
- 11 | Top 20 Retailers in Poland, M+M Planet Retail, unpublished information. Ranking according to company turnover in 2002
- 12 | Top 20 Retailers in Hungary, M+M Planet Retail, unpublished information. Ranking according to company turnover in 2002
- 13 | Top 11 Retailers in Czech Republic, M+M Planet Retail, unpublished information. Ranking according to company turnover in 2002
- 14 | Top 10 Retailers in Slovakia, M+M Planet Retail, unpublished information. Ranking according to company turnover in 2002
- 15 | Sources: PG Economics, Oil World, American Soybean Association, in: The Non-GMO Source, August 2004
- 16 | Examples: Carrefour, Auchan, Ferrero, Barilla
- 17 | Top 30 Grocery Retailers Worldwide, 2003, by Corinne Millar, M+M Planet Retail, June, 2004
- 18 | Top 30 Grocery Retailers in Europe, 2003, by Corinne Millar, M+M Planet Retail, June, 2004
- 19 | Leatherhead Food International (2003), in Big deals are out, Food Engineering & Ingredients, June 2003
- 20 | Leatherhead Food International, in "Big deals are out", Food Engineering & Ingredients, June 2003
- 21 | <http://www.gmabrands.com/publicpolicy/biotechnology.cfm>
- 22 | Soybeans Mixed With Altered Corn; Suspect Crop Stopped From Getting Into Food, The Washington Post November 13, 2002



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links to greenpeace worldwide consumer websites

greenpeace international

www.greenpeace.org/stopGMO

australia

www.greenpeace.org.au/truefood/index2.html

austria

www.greenpeace.at/909.html

belgium

www.greenpeace.org/belgium_fr/campaigns/intro?campaign_id=353877

www.greenpeace.org/belgium_nl/campaigns/intro?campaign_id=178586

brazil

www.greenpeace.org.br/consumidores/guiadoconsumidor.php

canada

www.greenpeace.ca/shoppersguide/

www.greenpeace.ca/guideogm/index.php

chile

www.greenpeace.org/chile_es/campaigns/intro?campaign_id=468148

china

www.greenpeace.org.hk/eng/gm_main.adp

czech republic

www.greenpeace.cz/gmo/spotreb.shtml

france

www.greenpeace.fr/campagnes/ogm/liste/index.php3

germany

www.greenpeace.org/deutschland/?page=/deutschland/fakten/einkaufsnetz/

greece

www.greenpeace.gr/pages/gmo/gmo_guide_note.htm

www.greenpeace.gr/library/gmos/Consumers_Guide.pdf

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LINKS/ANNEXES

hungary

www.greenpeace.hu/campaigns/story/story_26.html

italy

www.greenpeace.it/ogm/

mexico

www.greenpeace.org/mexico_es/campaigns/intro?campaign_id=553585

netherlands

<http://archive.greenpeace.nl/gminfo/lijsten/00huismerk.shtml>

new zealand

www.greenpeace.org.nz/truefood/default.asp

slovakia

www.greenpeace.sk/campaigns/story/story_149.html

south east asia

www.greenpeacesoutheastasia.org/en/seaissuee01.html

spain

www.greenpeace.org/espana_es/campaigns/intro?campaign_id=159562

uk

www.greenpeace.org.uk/Products/GM/

usa

www.truefoodnow.org/

ANNEX 1: RANKING OF TOP GLOBAL RETAILERS ACCORDING TO THEIR GROCERY SALES IN 2003

RANK	COMPANY	COUNTRY OF ORIGIN	NET SALES 2003 (USD MN)	RETAIL BANNER SALES 2003 (EUR MN)	GROCERY SALES (%)	DOMESTIC SALES (%)	FOREIGN SALES (%)	GROCERY SALES UNDER RETAIL BANNERS 2003 (MIO EURO) <small>CONVERSION USD/EURO = 1/0,8854</small>
1	Wal-Mart	USA	256.329	278.081	43,7	79,1	20,9	107.595
2	Carrefour	France	79.609	100.044	77,4	50,7	49,3	68.500
3	Ahold	Netherlands	63.325	85.974	84,0	15,8	84,2	63.942
4	Tesco	UK	50.326	54.807	74,6	80,1	19,9	36.200
5	Kroger	USA	53.791	56.024	70,2	100,0	0,0	34.822
6	Ito-Yokado	Japan	30.541	59.639	62,5	73,8	26,2	33.002
7	Rewe	Germany	44.251	48.246	75,6	71,4	28,6	32.294
8	Aldi	Germany	41.011	43.051	83,6	63,0	37,0	31.866
9	Metro Group	Germany	60.532	68.463	50,5	52,9	47,1	30.612
10	Casino	France	25.958	46.905	73,3	58,9	41,1	30.441
11	ITM	France	37.723	43.815	77,3	72,2	27,8	29.988
12	Schwarz Group	Germany	33.357	36.707	83,0	66,2	33,8	26.975
13	Safeway (USA)	USA	35.552	38.855	75,5	85,3	14,7	25.974
14	Edeka	Germany	29.670	33.362	83,8	91,2	8,8	24.753
15	Costco	USA	41.693	45.331	61,0	81,5	18,5	24.483
16	Albertsons	USA	35.436	37.279	68,0	100,0	0,0	22.445
17	Auchan	France	32.422	42.439	57,2	57,5	42,5	22.378
18	Sainsbury's	UK	27.995	29.788	73,3	85,1	14,9	19.333
19	Tengelmann	Germany	27.721	30.193	69,7	49,1	50,9	18.633
20	Leclerc	France	27.332	30.789	59,9	95,7	4,3	16.329
21	AEON	Japan	30.574	38.058	47,2	91,7	8,3	15.904
22	Delhaize Group	Belgium	21.256	22.927	77,1	20,1	79,9	15.651
23	Loblaws	Canada	18.002	20.027	77,5	100,0	0,0	13.742
24	Système U	France	7.300	13.640	85,3	100,0	0,0	11.635
25	Walgreens	USA	32.505	34.196	38,0	100,0	0,0	11.505
26	Safeway (UK)	UK	12.920	13.568	79,6	100,0	0,0	10.872
27	Coop Norden	Sweden	9.427	14.853	71,7	34,0	66,0	10.649
28	Coles Myer	Australia	17.523	18.993	58,5	99,4	0,6	9.838
29	Coop Italia	Italy	10.409	11.277	83,4	99,7	0,3	9.405
30	Target	USA	48.163	50.667	17,8	100,0	0,0	9.019

BASED ON: TOP 30 GROCERY RETAILERS WORLDWIDE, 2003, AND TOP 30 RETAILERS IN EUROPE, 2003, M+H PLANET RETAIL, JUNE 2004

ANNEX 2: RANKING OF THE TOP FOOD AND DRINK PRODUCERS WORLDWIDE ACCORDING TO THEIR FOOD AND DRINK SALES IN 2002

RAN	COMPANY	COUNTRY OF ORIGIN	YEAR END	TOTAL SALES (EURO MN)	FOOD SALES (EUR MN)
1	Nestlé	Switzerland	Dec-02	54.072	50.999
2	Altria Group / Kraft Foods	USA	Dec-02	75.584	27.940
3	ConAgra Foods	USA	May-02	25.972	25.972
4	Unilever	Netherlands/UK	Dec-01	46.538	25.072
5	PepsiCo	USA	Dec-02	23.605	23.605
6	Archer Daniels Midland Company	USA	Jun-02	22.047	22.047
7	Tyson Foods	USA	Sep 02	21.965	21.965
8	Cargill	USA	May-02	47.752	20.210
9	Coca-Cola	USA	Dec-02	18.390	18.390
10	Mars	USA	Dec-01	14.382	14.382
11	Diageo	UK	Jun 02	15.801	14.229
12	Anheuser-Busch	USA	Dec-02	12.752	12.752
13	Danone	France	Dec-02	11.977	11.977
14	Kirin Brewery	Japan	Dec-01	11.789	10.610
15	Asahi Breweries	Japan	Dec-01	10.819	10.387
16	HJ Heinz Company	USA	Apr 02	8.865	8.865
17	Sara Lee Corporation	USA	Jun 02	16.570	8.666
18	Dean Foods Company	USA	Dec-02	8.452	8.264
19	Snow Brand Milk Products	Japan	Mar-02	8.792	8.000
20	Kellogg Company	USA	Dec-02	7.806	7.806
21	Heineken	Netherlands	Dec-01	8.146	7.739
22	General Mills	USA	May-02	7.472	7.472
23	Dairy Farmers of America	USA	Dec-01	7.428	7.428
24	Cadbury Schweppes	USA	Dec-02	7.426	7.426
25	Nippon Meat Packers	Japan	Mar-02	7.134	7.134
26	Parmalat	Italy	Dec-01	6.948	6.948
27	InBev (Interbrew)	Belgium	Dec-01	6.503	6.503
28	Suntory	Japan	Dec-00	5.974	5.853
29	Campbell Soup Company	USA	Jul 02	5.765	5.765
30	Maruha	Japan	Mar-03	6.349	5.713

CONVERSION USD/EURO: 1/0.94

SOURCE: LEATHERHEAD INTERNATIONAL, IN: "BIG DEALS ARE OUT", FOOD ENGINEERING & INGREDIENTS, JUNE 2003

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ANNEXES

annex 3 explanation of columns in table 1 - ranking of the top european retailers

Column 1 indicates a company's ranking number (see further explanations under column 3).

Column 2 indicates the retailers name, its home market ("country of origin") and the company's domestic sales. "Domestic sales" is defined as the percentage of the total net sales in Europe that the company achieves in its country of origin.

Column 3 indicates the companies "European Grocery Sales under the company's retail banners" for the year 2003. In our view, the product of these two parameters reflects best a company's relevance in the European food and drink market.

Example: Carrefour's retail banner sales in 2003 amounted to 75.908 million Euro. 78,4% of these retail banner sales were made by grocery sales (mainly food related sales, see definition below). So Carrefour's grocery sales under all retail banners which belong to Carrefour are $75.908 \text{ million Euro} \times 0,784 = 59.511 \text{ million Euro}$.

Retail banner sales Retailers are not only operating under the company's own brand name, but often under several so called "retail banners". While "net sales" (the parameter usually used for rankings) only take into account the sales generated by a retailer from its own operations, "retail banner sales" is the sum of the sales of all stores under a retailer's banner, including sales from the retailer's own gross sales (figures given are consolidated sales inclusive of VAT and other sales taxes).

Grocery sales As no specific figures for food and drink sales were available, we choose the parameter of "grocery sales" for our calculation of the ranking. "Grocery sales" is defined as including sales from food, drugstore items and everyday household goods. In M+M Planet Retail's data, the percentage of grocery sales directly relates to a company's retail banner sales.

Column 4 indicates the banners under which a retailer operates.

Column 5 indicates the regions and countries in Europe and worldwide where a retailer is operating.

Column 6 indicates the regions or countries in Europe where Greenpeace has received a written non-GM commitment from the retailer; including specific comments where and for what areas the non-GM commitment is valid. Note: the non-GM commitment only refers to the retailers own brands.

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annex 4

explanation of columns in table 2

- ranking of the top european food and drink producers

Column 1 indicates a food and drink producers ranking number, according to FFT data.

Column 2 indicates the company and its "country of origin".

Column 3 indicates the companies' estimated food and drink sales for the year 2002, in million Euro (example for Nestlé: 32.783 mio Euro = 32 783 million Euro).

Column 4 indicates the main brands of a company as well as a company's main subsidiaries.

Column 5 indicates the regions or countries in Europe where Greenpeace has received a written non-GM commitment from the food and drink producers; including specific comments where and for which areas the non-GM commitment is valid.



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