



**SAAFoST**

**The South African Association for  
Food Science & Technology**

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Directorate – Food Control  
Department of Health  
Private Bag X828  
Pretoria 001

09/03/2005

Dear Sirs,

Labelling of GM Foods: Notice No R25 in Gov Gazette No 25908 of 16 Jan 2004

This Association believes that the regulation relating to the above, which is the culmination of much time and effort from a wide spectrum of food oriented professionals and legislators in this country, is sound, workable and realistic and that it offers good safety and price protection to the South African public.

The regulation, however, goes only part of the way in satisfying South Africa's needs. SAAFoST is of the opinion that the regulation should be strengthened by the addition of sections to regulate the use of claims such as "GM free" and "non GM" and that this should be done as soon as the standard published by the SABS to provide guidelines on genetically modified products and their identity preservation is available. Until the SABS guidelines have been finalised, SAAFoST is not in favour of any changes being made to the existing regulation above.

Regarding the Standard 1.5.2, as published by the Australia/ New Zealand Food Authority and circulated at the FLAG meeting recently as a benchmarking exercise, this Association is of the opinion that it offers no additional protection or benefit as we see no reason from a food safety and risk assessment perspective to treat GM material any differently from that derived from conventional plant breeding methods, unless its use results in a product with significantly altered characteristics as per the current regulations. By planning to incorporate a "Non GM" claim in our future regulation but without going

to the lengths required by the Australia / New Zealand Standard 1.5.2, we will be accommodating more affluent consumers who are able to pay for "a right to know" without subjecting those who have "a right to eat" to further price induced hardship. We are also concerned that implementation of the Australia / New Zealand Standard would potentially provide an opportunity for an uninformed and vociferous minority of activists to spread totally unsubstantiated scare stories regarding the safety of GM material among poorly educated low income consumers. This could in turn force food companies (and in particular those producing staple foods) into implementing elaborate and expensive identity preservation systems in order to avoid the need to declare the presence of GM material on their products. This could cause an unnecessary increase in staple food prices and potentially inhibit the use of GM technology in local agriculture. We do not believe that this would be beneficial to consumers and it would also be in conflict with government's declared policy of supporting the responsible and well-regulated use of GM technology for the benefit of the South African public.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "Nigel Sunley". The signature is written in a cursive, slightly slanted style.

Nigel Sunley  
SAAFoST President 2003-2005