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#### COVER NOTE

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From: Irish Parliament  
date of receipt: 22 June 2015  
To: President of the Council of the European Union

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Subject: Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EC) No 1829/2003 as regards the possibility for the Member States to restrict or prohibit the use of genetically modified food and feed on their territory  
doc. 8356/15 AGRI 222 AGRILEG 95 DENLEG 67 MI 271 CONSOM 70 SAN 132 CODEC 609 - COM (2015) 177 final  
*- Opinion on the application of the Principles of Subsidiarity and Proportionality<sup>1</sup>*

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Delegations will find attached the above-mentioned document.

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<sup>1</sup> Translation(s) of the opinion may be available on the Interparliamentary EU Information Exchange site IPEX at the following address: <http://www.ipex.eu/IPEXL-WEB/search.do>

An Comhchoiste um Talmhaíocht,  
Bia agus Muir  
Teach Laighean  
Baile Átha Cliath 2

Teil: (01) 618 3717  
Ríomphost: afm@oir.ie



Joint Committee on Agriculture, Food  
and the Marine  
Leinster House  
Dublin 2

Tel: (01) 618 3717  
Email: afm@oir.ie

AFM-i-477-2015

19 June 2015

Mr Donald Tusk  
President  
European Council  
Justus Lipsius building  
Rue de la Loi 175  
1048 Brussels

**Political Contribution - COM (2015) 177: Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EC) No 1829/2003 as regards the possibility for the Member States to restrict or prohibit the use of genetically modified food and feed on their territory.**

Dear President Tusk,

The Oireachtas Joint Committee on Agriculture, Food and Marine considered the COM (2015) 177 on the issue of the restriction or prohibition of the use of genetically modified food and feed by members in their own territory and has agreed the attached views for consideration as part of the Commission's political dialogue process with national parliaments.

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Andrew Doyle T.D.  
Chairman  
19 June 2015

*Cuirfear fáilte roimh chomhfhreagras i nGaeilge*



**Tithe an  
Oireachtais**  
Houses of the  
Oireachtas

**Joint Committee on Agriculture, Food and the Marine**

**Political Contribution – COM (2015) 177 : Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EC) No 1829/2003 as regards the possibility for the Member States to restrict or prohibit the use of genetically modified food and feed on their territory.**

**June 2015**

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**An Comhchoiste um Thalmhaíocht, Bia agus Muir**

**An Cion Polaitiúil - COM (2015) 177 : Togra le haghaidh Rialachán ó Pharlaimint na hEorpa agus ón gComhairle lena leasaítear Rialachán (CEE) Uimh. 1829/2003 maidir leis an bhféidearthacht atá ann do na Ballstáit úsáid bia ghéinmhodhnaithe agus úsáid beatha géinmhodhnaithe ina gcrióch a shrianadh nó a thoirmeasc.**

**Meitheamh 2015**

**Political Contribution – COM (2015) 177 : Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EC) No 1829/2003 as regards the possibility for the Member States to restrict or prohibit the use of genetically modified food and feed on their territory.**

**Introduction**

The Oireachtas Joint Committee on Agriculture, Food and the Marine (the Committee) has considered COM (2015) 177: Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EC) No 1829/2003 as regards the possibility for the Member States to restrict or prohibit the use of genetically modified food and feed on their territory.

**Background**

The topic of genetically modified organisms was on the Committee's Work Programme for 2015 because it has been recognised as an important developing policy area for the Committee. Additionally, the Committee is aware that the issue of GMOs is being considered by both the EU and the USA as part of the ongoing negotiations of the Transatlantic Trade and Investment Partnership (TTIP). The potential use of GMOs is an emotive issue for a traditionally family-based agricultural model such as Ireland, where smaller holdings have been the norm.

The Committee invited before it officials from the Department of Agriculture, Food and the Marine, the Department of Health, Food Safety Authority Ireland and the Environmental Protection Agency at a Committee meeting on 9<sup>th</sup> June 2015 to gain a thorough understanding of the proposal. Having considered the proposal, the Committee is submitting this political contribution for the consideration of the European Commission.

**GMOs and Ireland**

The animal feed sector in Ireland, including the importers and feed manufacturers are strongly opposed to the proposal to restrict accessibility to imports of authorised GM feeds. The Irish compound feed manufacturers strongly support the Department of Agriculture, Food and Marine's current policy of positive but precautionary stance in relation to the authorisation of the GM applications for feed. The issue has been discussed with the Irish Grain and Feed Association who represent feed importers and manufacturers. We also anticipate discussions on these proposals with farmer representatives and NGOs interested in the environment.



### **The Committee's views on COM (2015) 177**

1. The Committee does not agree with the proposal in its current form as it believes that it may excessively increase the presence of GMOs within the EU food chain.
2. The agricultural heritage of Ireland has traditionally been non-GMO based, and the Committee is apprehensive of Commission proposals which may impinge on this.
3. The criteria on which a Member State can object to the entry of a GMO product into its country are very restrictive under the proposal.
4. The Committee is sceptical on the issue of who will benefit from the liberalisation of GMO materials in the EU. While the ambition of the Commission may be to enable smaller farmers to utilise GMO products if they so choose, it may be the case that larger corporations exploit the situation to control the market.
5. The Committee is wary of the potential for unauthorised or unapproved GMO material creeping into the food chain of the EU.
6. Increased yields of crops with the assistance of GMO materials could severely damage the indigenous grain industry in Ireland as such crops are generally much cheaper to produce.
7. GMO-based production tends to flourish in low income economies. The expansion of GMO products across the EU may therefore damage European economies by lowering the economic value of production.
8. This proposal comes at a time when Ireland is attempting to encourage an increase in organic products entering the Irish food market, and may damage consumer confidence in the organic food industry if it proceeds as proposed.
9. The Committee is apprehensive of an ever increasing use of GMO products should this proposal proceed. TTIP negotiations may result in the USA promoting their more accepting views on GMOs onto the EU if proposals such as this pass.

### **The Committee's recommendations on COM (2015) 177**

1. Proposals from the Commission should prioritise the development of protein crops within the EU before considering policies which expand the use of GMO food and feed within the EU.

2. The Committee believes that the European Food Safety Authority should persist with pan-European responsibility for assessing the safety of GMOs.
3. Any GMO product on sale should be clearly marked as such so that a consumer can make an informed decision on whether or not to purchase it.

The Joint Committee wishes for its views to be taken into account and looks forward to the response to its observations from the European Commission.



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Andrew Doyle T.D.  
Chairman  
19<sup>th</sup> June 2015