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WHAT'S IN A LABEL?

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What's in a label? A lot more than information when it comes to foods and food ingredients produced from genetically modified plants.

The United States, Canada, Japan and, more recently, Australia and New Zealand have guidelines in place that require labeling of products from genetically modified plants – whether whole foods or ingredients – if the product is substantially different in nutritional content or identity from what is already on the market or if there is a safety issue, such as the introduction of a known allergen.

The U.S. Food and Drug Administration (FDA) has been clear that it is concerned with food products and does not require a label for process, meaning for how the product was developed or grown. U.S. food labels must provide information about nutrition, composition and safety – with the same rules in place for all food products, genetically modified or not. Three out of four American consumers, according to a Wirthlin survey in 1997, agree with the FDA policy.

Europe has taken a different route, not only with approval of Novel Foods guidelines, which apply to more than genetically modified food products. In addition, a decision at the European Union level was made to label herbicide-tolerant soybeans and insect-protected corn that would have fallen outside the Novel Foods guidelines. The European guidelines are based on labeling for process – how the food was created – as well as the safety and composition of the end product.

When the first genetically modified foods went on the market in the United States, in late 1994 and early 1995, it was with great fanfare, media coverage and discussions of labeling – both pro and con. The Flavr Savr® tomato, marketed by Calgene under the MacGregor® brand, was branded and voluntarily identified as a product of biotechnology – stickered with the Flavr Savr name and accompanied by in-store information about the delayed-softening tomato. Although production problems eventually led to the tomato's removal from the fresh tomato market, the Flavr Savr was well-received by consumers who were willing to pay a premium for a tomato that promised somewhat better flavor even in the dead of winter.

Several years later, Monsanto's insect-protected NewLeaf® potatoes were branded as NatureMark® potatoes, identified and promoted as genetically modified or products of biotechnology, and sold in

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supermarkets in several areas. This was done primarily as a test to see if consumers would buy, even at a premium price, genetically modified produce "grown a better way." Consumers in those test markets, in eastern Canada and parts of the U.S., voted yes with their pocketbooks. The branded potatoes involved only a small percentage of the NewLeaf potato crop, with the remainder going into a variety of foods, from frozen french fries to potato chips. After two years, having proven that consumers support products of biotechnology, Monsanto's NatureMark division ended the branding test earlier this year to concentrate on the development of additional potato products and its potato seed business. NewLeaf potatoes continue to grow in market penetration, commingled with other equivalent potatoes in both the fresh market and in processed potato products.

In the United Kingdom, tomato paste made from tomatoes containing Flavr Savr technology has been on the market for several years. This product, from Zeneca, has been well received. The fact that the product is produced from genetically modified plants is made clear on the label.

In each of the above cases, the labeling or branding as a product of biotechnology or genetic modification has been voluntary. It should be expected that additional voluntarily labeled or branded products of modern biotechnology will appear on the market. If there is consumer demand for special products with specific information, the marketplace has always been willing to accommodate those desires, usually for a higher price.

Monsanto is a leading proponent of modern biotechnology in order to improve food, health and the environment. We are convinced of the benefits that biotechnology can bring to consumers and farmers and the businesses involved in all of the steps between the farm and the dinner table. And we're not alone in this. A number of other companies, as well as government agencies, around the world have developed or are developing products employing biotechnology techniques. It is estimated that crops involving modern biotechnology are being grown commercially on 65 million or more acres globally in 1998.

Plants and food products involving modern biotechnology have been shown to be safe for humans, farm animals and the environment. Monsanto does not believe there is a scientific basis to require labeling of food products simply because they are produced through modern biotechnology. We have acknowledged, however, the desire for labeling by European consumers. We will, of course, be responsive to European regulatory authorities when labeling is required, and to the European food and retailing industries in their efforts to provide consumers with information, on a label or otherwise.

We believe that any labeling statements must be capable of verification and enforcement. Appropriately validated detection methods will be critical when labeling is required. While there may well be a place for products identified as not containing ingredients derived from modern biotechnology, such labeling must be verified through analytical techniques and must be truthful and not misleading.

Will a "does contain" label on a food product in Europe do no more than satisfy a consumer‘s right to information or will it cause consumers to avoid the labeled product? Will it be seen as what it is – information – or perceived as a warning? Only time and experience will tell. However, there are indicators that a label may have little or no effect broadly on consumer selection.

In The Netherlands, where some products containing soybean have been labeled for some time, research conducted by A.C. Nielsen for Monsanto showed that information on the product indicating it contained an ingredient "produced using modern biotechnology" had no impact on sales. Nielsen

tracked five products for 10 weeks throughout the Netherlands in 1997 and reported that all of the brands involved showed no change in their respective share, standardized share or value share over the period. This is one brief look at one market, and the wording that will be required by the European Union will be different than that on the labels in The Netherlands. Experiences with more products in other markets as food companies comply with new guidelines, could be different.

What is more important than what is on the label is what is *understood* about what the words on the label mean. Unfortunately, research from various parts of the world indicates that awareness of the term "genetic engineering is high –but understanding is very low. The challenge is to have an honest, verifiable label and also to have reliable and accurate information available and understood, not only by consumers, but those they trust to give them advice about food safety and food distribution.