

Comments by GeneWatch UK to 2001/18/EC marketing application reference C/NL/04/02

(April 2005)

GeneWatch would like to comment briefly on only one aspect of this application - the use of carnations as a food garnish and the appropriate nature of this application.

The scope of Directive 2001/18/EC can only assess (in this case) the environmental and human health effects of actually importing and selling carnation line 123.2.38. It cannot assess the human health effects of eating carnation line 123.2.38. Such an assessment falls within the scope of Regulation (EC) 1829/2003

The advisory committee for the Dutch Competent Authority (the COGEM), in their advice on this application (7th February 2005) accept that these carnations can and will be consumed as a food. On page 6 they state:

This notification is for the import and distribution of cut flowers and not for food purposes. Therefore, retailers will not be allowed to sell the petals of the genetically modified carnation for food purposes. However, it can not be entirely excluded that individuals will use petals of bought flowers to garnish their plates.

Having accepted that the carnations may well be eaten, the COGEM goes on to explain that;

The applicant did not fully characterise the borders and flanking sequence of the inserts. Therefore, it can not be excluded that chimeric ORFs have been created. These ORFs could theoretically be expressed and encode proteins with detrimental effects. It is unlikely that persons will consume large amounts of petals since it is used as garnishing and not as a food.

Florigene themselves (Section B Annex ii Environmental Risk Assessment), accept that petals may be consumed. They go on to describe how the present literature led them to believe that if they were consumed there would not be a health problem. There are no results of human toxicity tests carried out directly with carnation line 123.2.38 reported in the e.r.a.

Considering the above GeneWatch UK believes:

1. The application C/NL/04/02, the comments of the COGEM and the initial assessment report of the Dutch Competent Authority, all accept that the petals of these carnations are likely to be consumed - this should be sufficient to trigger the requirement for authorisation under Regulation (EC) 1829/2003, prior to import authorisation being granted to this application.
2. As there is a lack evidence on the safety of consuming these carnations and considering the COGEM cannot rule out the possibility that chimeric ORFs have been created, GeneWatch does not believe that these carnations can be imported and sold "as any other carnations"
3. Furthermore, food fashions can change rapidly. In today's world of the celebrity chef, it would only take an enthusiastic TV chef like Jamie Oliver to multiply the use of carnations as a food. As healthy eating messages continue to be promoted to the public salad eating may well increase and with it the desire to utilise a wider range of ingredients.