



EUROPEAN COMMISSION  
HEALTH AND CONSUMERS DIRECTORATE-GENERAL  
Safety of the Food Chain  
Innovation and Sustainability

Brussels, 14 May 2012  
D(2012)

**Working Group of the Advisory Group of the Food Chain, Animal Health and  
Plant Health on the impact assessment of measures on animal cloning for food  
production in the EU  
Summary report  
14 MAY 2012**

**Participants:**

Commission - DG Health and Consumer:

Chantal Bruetschy (Head of Unit E6)

José Luis de Felipe Gardón (Deputy Head of Unit E6)

Stakeholders: please see list attached

**1. Introduction**

Ms Bruetschy, Head of Unit E6, chaired the meeting. She explained that the purpose of the meeting, in the framework of the impact assessment procedure, was to collect the stakeholders' views on the possible measures to regulate the use of cloning for food production in Europe, as set out in the published roadmap. The aim of the impact assessment is to define the most appropriate policy while ensuring the functioning of the internal market, respecting the WTO agreements and guaranteeing consumer information.

**2. General positions on cloning**

CIWF stated its position against cloning, based on two general problems: the welfare issues for clones and the surrogate mothers and the fact that the technique will be used to produce copies of animals genetically selected for high yields despite the EFSA reports showing that high yielding animals often suffer from serious health and welfare problems. In this regard, the representative felt that current animal welfare legislation is not up to date on problems of high yield animals. He emphasized the need for ethic consistency and thus that any measure on offspring should take into account that such animals are the result of the use of the cloning technique at some stage. He also worried that feasibility hurdles would serve as an excuse for inaction. Finally, he stressed that the absence of safety issues does not make the problem of cloning less relevant to consumers.

UECBV is of the view that cloning is not of great interest for the meat industry in Europe today, as other breeding methods work better and faster for the purpose of animal

selection, but that cloning might become relevant in the future. However, cloning is currently used in third countries that have trade relations with the EU. The uncertainty regarding the usage of the technique in the world would make identification and labelling requirements difficult to implement. The representative also felt that the tracing systems in place for cattle should not lead to an excessive and unfair burden on the beef industry. CLITRAVI said that WTO obligations must be respected, as import restrictions for products related to cloning (reproductive material, live animals and food) could be negatively perceived as technical barrier to trade.

COPA-COGECA stressed the importance of SME's in Europe and that the majority of farmers are against cloning for food production purposes, since consumers are against it. However, Europe cannot isolate itself from the rest of the world, and the use of the cloning technique outside the EU has to be carefully assessed. The fact that food from clones and offspring is not distinguishable from other food raises feasibility issues for traceability and labelling.

EFFAB mentioned that measures must be enforceable and that animal cloning is a reproduction technique, not a breeding technique.

HOLSTEIN UK felt that progeny from clones and food from clones and offspring would be hard to trace and, therefore, expressed concern about the effectiveness of possible legislation.

EUROGROUP for ANIMALS is not in favour of cloning for the same reasons exposed by CIWF. They believed that farmers that buy breeding material to improve the yield of animals should have information on where the reproductive material comes from.

BEUC stated its position against the use of cloning for food production, given the great dissent of consumers. The representative stressed that consumers should have the right to choose and that, if marketed, food from clones and offspring should be labelled.

FOODDRINK EUROPE has yet no official position on cloning; however it felt that, given there is no food safety but only an animal welfare issue, the topic relates more to actors upstream in the agricultural industry than to consumers. Possible measures should avoid trade disruptions, be proportionate and enforceable, and preserve the trust of consumers in the food industry.

### **3. Detailed discussion**

To help the discussion, it was suggested to divide the theme into four main streams:

a) current traceability of reproductive material/live offspring, b) possible tracing of reproductive material from clones/live offspring from clones, c) labelling and d) pre-market approval

#### a) Current traceability of reproductive material/offspring

Cattle: HOLSTEIN UK said that for pedigree animals, it is possible to know the ancestry of animals and reproductive material.

COPA-COGECA and UECBV observed that not all animals are purebred and registered in herd books, as it is not mandatory. Moreover, COPA-COGECA and HOLSTEIN UK

pointed to the cross-bred animals, which are also not in the herdbooks. The percentage of cross breeds varies between 25% and 50 %, depending on the breed.

FVE held that farmers sometimes trust an expert breeder and choose the semen based on production expectations rather than based on its ancestors. In relation to this, COPA-COGECA mentioned that farmers may follow breeding programs to select the reproductive material they buy. In both cases, farmers may not be interested in the identity of the sire.

Pigs: In most cases, breeding takes place with artificial insemination (AI) and no longer with natural mating (in some countries AI is reaching 80-90 %). COPA-COGECA said that, when AI is used, it is done with fresh and not frozen semen. Semen is traded in limited amounts.

Goats: Farms are usually small and not attached to breeding organizations. The percentage of AI is very low (it dropped considerably compared to 20 years ago, maybe between 5 % and 10 %, exact figures are not available),UECBV observed that in the Netherlands production of breeding material for goats was stopped because it was not profitable.

#### b) Possible tracing of reproductive material from clones/live offspring from clones

HOLSTEIN UK said information on whether an animal is a clone can be included in the supporting documentation of pedigree animals, but that it would be difficult to verify the reliability of this information. However, not all Holsteins have a pedigree. The representative stressed that individual identification of animals does not exist in many countries, making a global certification system an unlikely possibility.

UECBV said that, in order to be credible, a declaration on import certificates should not be based on the information on herd books only. It should instead be supported by official certification from public authorities. However, the representative considered that this measure could put the EU at risk of retaliation.

A database with information on individual animals, similar to the one in place for European cattle, would only be useful if the major trade partners had one. This is not seen as a realistic possibility. Finally, a system restricted to European production would represent an unfair burden on European farmers, decreasing their competitiveness.

CLITRAVI stated that a traceability system based on unreliable information would open the possibility for food scares. The representative doubted that third countries, such as the USA, would accept a measure requiring official certification of imports.

EDA noted that, today, imports are allowed on the basis of the information provided by official certificates. They thus considered that inspections on procedures and official certificates would be sufficient to guarantee that foreign producers provide reliable information on reproductive material from clones and live offspring. Although less preferred, a system of "own check" procedures could work as well. This would force foreign producers, who wish to export into the EU, to have a procedure in place to guarantee reliable information.

EFFAB reiterated the statement of COPA-COGECA on the impossibility of checking if a product involved cloning at some stage. FVE mentioned that a clone can be recognized by testing DNA.

Reacting to CLITRAVI's statement on unreliable traceability system and food scares, BEUC stressed that information is key to building consumer confidence in the food system. Rather than waiting for news stories on "cloned" food to appear in the media – which will also result in costly food scares –, BEUC emphasized the importance to have, as soon as possible, a reliable system in place to inform consumers. UECVB thought that giving reliable information to consumers is important in this respect and mentioned the hormone free beef scheme as an example.

Horses are usually not bred for food production purposes, but EDA said imported sports horses can be slaughtered and enter the food chain. COPA-COGECA said AI is not allowed in several major breeding organizations. Only geldings could need to be cloned, as they cannot reproduce naturally.

### c) Labelling

CIBC noted that mandatory labelling would have the consequence that food from clones and offspring from clones would not be marketed and that no label would then exist in Europe.

UECVB are not in favour of labelling. They stressed that labelling must be based on a good traceability system with strong guarantees on the reliability of the initial information. This is particularly important because the technique is perceived negatively by consumers. FVE suggested cloning could become a positive attribute in the future and that labels would be perceived as a value added to products. UECVB responded that, currently, this is not the case. They felt that the likely consequence of labelling would be the interruption of imports of reproductive material from clones.

EUCOLAIT noted that any measure relating to food from offspring and descendants of clones (suspension, pre-market approval or mandatory labelling system) would effectively block imports of dairy products and likely be challenged at the WTO. As regards labelling of products from offspring and descendants born in the EU, EUCOLAIT considered that it would be difficult to label processed milk products because the milk comes from many animals. EDA responded that, in the production process, separating the milk of specific cows is feasible and is done regularly in the case of animals under medical treatment. This could be done also for cows that are clones or offspring from clones. However, it is likely that as a consequence farmers will avoid having clones and offspring from clones in their herd. Finally, EDA stressed that a labelling system should not be retroactive and should include a transition period.

CLITRAVI expressed the view that labelling of food from clones could create trade disruptions.

CIWF noted that retailers and consumers in Europe do not want cloning and that justifying measures with the WTO would not be impossible. The argument would need to be constructed properly, based on consumer perceptions and behaviour, the clause on public morals and case law.

FOODDRINK EUROPE does not have an official position on labelling yet. It noted that in Europe, so far, labelling has killed technology and that it would be difficult to guarantee reliable information at all. It believed that labelling of food from clones could create trade disruptions.

BEUC stressed the importance of informing consumers and that trust is always involved in the business to business relation between producers and their suppliers. Consumers have not supported products deriving from new technologies when they do not see the benefits for them of using such technologies. Also in the US, consumers have strong concerns over the use of animal cloning for food production and consumer organizations in the EU and US, through the Transatlantic Consumer Dialogue (TACD), issued a joint resolution in 2008 for the suspension of food from clones. Reacting to a comment that it would be very difficult to impose labelling on imported food of animal origin, the representative said that, even though direct labels would be the preferred option also for third country products, country of origin information could be used by consumers as an indication of the possibility that cloning took place at some level of the production chain.

EUROCOMMERCE has no position on labels yet. In general, retailers aim at offering consumers what they expect.

COPA-COGECA expressed a preliminary position against labelling of food from offspring of clones because it does not see traceability as a feasible possibility. Farmers are not likely to take the risk of having clones and offspring from clones in their herds. The result of labelling would be to segregate the production flows of food from clones and their offspring and food from conventional animals. In the medium term, restricting the commercial use of the cloning technique could have a negative impact on the competitiveness of European farmers. They considered that if a certification system would be required only at European level, an unfair burden would be put on European producers with respect to producers outside Europe. Finally, COPA-COGECA underlined that research would only be pursued if it has prospects of commercial application.

EFFAB worried that labelling and traceability measures would hinder research on cloning in Europe, which would risk decreasing the competitiveness in the future.

There were no particular comments on descendants of offspring of clones or on the pre-market approval measure.

AVEC, ECSLA, FESASS, INFOAM EU, UEAPME and OIE did not express an opinion on the questions raised.

## **5. Conclusions**

COM thanked the stakeholders for their contribution and asked them to complete the public consultation questionnaire with all the necessary technical explanation and data where possible.