

Statement on Issues Related to Labelling of Genetically Modified Foods
Presented to the Standing Committee on Health
House of Commons

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Honourable Chair and Members of the Committee:

Thank you for inviting Dr. Ellis and me to appear before you today to discuss with you some issues related to the important question of the labelling of genetically modified foods. Permit me to make a few remarks on an aspect of this question I consider an important component of the appropriate policy on this question.

Let me begin by qualifying my expertise in this area. I am a social philosopher, not a scientist, and am therefore more qualified to address the social, ethical, and political aspects of the GM food labelling issues than the scientific aspects. The scientific aspects were the focus of discussion in the Report of the Royal Society of Canada Expert Panel on the Future of Genetically Modified Foods, which Dr. Brian Ellis and I co-chaired. I will defer to Dr. Ellis to interpret for the Committee the Expert Panel's treatment of issues related to the labelling of GM foods on the basis of scientifically established health hazards. The Expert Panel did not find a justification on this basis for the mandatory labelling of GM foods, but did call for the implementation of a reliable and informative system of voluntary labelling. The Expert Panel made it clear, however, that it was not addressing other social, political, and ethical considerations that might justify a mandatory labelling requirement. It is to some of these considerations that I would like to draw the Committee's attention. These considerations in my view significantly strengthen the case for mandatory labelling. I would like to make it clear to the Committee that in addressing these issues I am representing only myself, and not the Royal Society of Canada or the Expert Panel on the Future of Food Technology.

These considerations I wish to address relate to the non-scientific, but socially critical, aspects of the health safety issue. It is now universally recognized among risk management experts that the question of the "safety" of a food, or any technology, is not a question of whether that food is entirely free of risks to humans, animals or the environment. All foods and technologies carry risks of various kinds along with their implementation and use. There is rarely such a thing as "zero-risk". We declare a product to be "safe" when the level of risk it imposes is judged "acceptable" by those who bear that risk – those who stand to be harmed should the risk materialize. So, determining whether a product is safe is a two-staged process.

The first stage involves a scientific identification and assessment of the types and magnitudes of risk inherent in the product; the second is a political and moral process of establishing the standards by which that assessed level of risk will be deemed acceptable. This, clearly, is why different individuals and social groups may judge the same level of

risk very differently. For some, the risk of *listeriosis* in raw milk cheese is acceptable; for others it is not. This difference is not a matter of competing scientific understandings of the level of risk, but a matter of differing standards of risk acceptance.

The acceptability of risks is determined largely by the way certain of their characteristics are perceived. Among the most significant of these are: the magnitude of the potential harm; whether the risks are outweighed by even greater benefit; whether the risks and the benefits are equitably distributed; whether the risks are easily identifiable and easily avoided or controlled; whether the risks are voluntarily assumed or imposed by others; and whether the managers of the risks (oneself or another) are trusted and respected. A relatively high risk (e.g., mountain-climbing) may be quite acceptable if the risk-bearers feel they voluntarily assume and control the risk, they reap the benefits and they trust the risk manager (e.g., themselves). On the other hand, an extremely low risk (e.g. vCJD from BSE infected beef) may be highly unacceptable if the risk-bearers perceive it to involve a highly dreaded potential harm, to be invisible and difficult to control their exposure, and involuntarily imposed for the benefit of others (the food industry and government) who have seriously mismanaged it.

These factors are widely known and accepted as the critical determinants of public acceptability of risks. And ultimately, as European regulators of food infected with BSE (“Mad Cow Disease”) have discovered, it is the public that has the final say on the acceptability of health risks, despite the judgments of the scientists and the economists about the relative weight of the risks and the benefits. The heightened European concerns about the safety of GM foods does not stem simply from the alleged tendency of a scientifically uninformed public to overestimate their health and environmental risks. It stems more from the fact that the risks, however minimal, are not acceptable because they bear a profile similar to that of the risk of vCJD – they are new and largely unknown, they are perceived as benefiting food producers while the risks are borne by the consumers, and they are being managed by an industry and regulatory bodies that have shown themselves to be unreliable managers of BSE (and other risks). Any risk with a profile like this is likely to suffer from low levels of public acceptance.

The European governments have recognized that the single most effective way to build public acceptance of genetically modified foods is through the implementation of a mandatory labelling regime. If products containing genetically modified ingredients are labelled, this makes several critical changes to the risk profile affecting perceptions of safety. First, it gives consumers the ability to control their exposure to GM foods and to whatever levels and kinds of risk they attribute to them. Second, it makes the risk-taking they associate with the products largely a voluntary choice. Thirdly, and perhaps most importantly in the current political context, it ameliorates public distrust of the industry and the regulators, not only by giving consumers greater ability to regulate their own exposure to risks, but also by undermining the commonly expressed sentiment that “If they (the industry) think there is nothing to hide, why, by opposing labelling of genetically modified foods, do they not want us to know what products contain them?”

In Canada and the US, there is currently much higher level of acceptance of GM foods than in Europe and elsewhere. However, this situation could change quickly and dramatically if we experienced a serious food safety issue, whether or not related to GM foods, that undermined public confidence in the industry and/or the government. In that situation the public's perception of GM foods would undoubtedly come to mirror more closely the European perception. In my opinion, it would be to the benefit of both industry and government, to say nothing of consumers, if there were a simple and reliable labelling system in place for GM foods that would give consumers the ability to control their response to the changing perception of the risk. I am confident that such control would markedly increase public acceptance of GM foods and the health and environmental risks attributed to them.

The continued opposition of government and industry to the labelling of GM foods merely serves to generate and reinforce public uneasiness about this technology. Consumers can easily see the contradiction in claiming both that the market, not regulators, should decide whether genetically modified foods are acceptable, and that the products containing GM ingredients ought not to be identified with labels so that consumers have a choice. This contradiction can only serve to further undermine the public trust in the industry and the regulators that is essential to acceptance of the technology.

I would be happy to respond to questions or comments from the Committee. Thank you.