

15. February 2011

Nordic Ecolabelling has prepared a proposal for revised criteria for ecolabelling of **Fuels**, which we give you the opportunity to comment before they are established by the Nordic Ecolabelling board. If you have any comments, we would like to receive these in writing **no later than 15. April 20**.

Proposal for the criteria: Nordic Ecolabelling of **Fuels**

Comments and standpoint

- |  |   |
|--|---|
| <input type="checkbox"/> Supports the proposal entirely  | <input type="checkbox"/> Refrain from giving comments and standpoints.                                |
| x <input checked="" type="checkbox"/> Supports the proposal but with the following objections: | <input type="checkbox"/> Refrain from giving comments and standpoints, but propose following changes. |
|  | <input type="checkbox"/> Rejects the proposal on the following basis:                                 |

Objections

The proposed **ban of genetically modified organisms and materials** produced from them **should be removed** from the criteria, because it is scientifically irrational.

See: Swan labelling of Fuel, Proposal: Version 2.0, 14 February 2011: R12 Genetically modified organisms (GMO). Raw materials used in the production of the Swan-labelled fuel must not be genetically modified.

GM plant varieties may be more eco-efficient than conventional ones. They can produce higher yields from smaller cultivation areas, require lesser input of energy and other limited resources and inflict a lesser burden on the environment.[1]

The discrimination of such eco-efficient plant varieties, contrary to indisputable scientific evidence, would mislead the general public and also their elected representatives making decisions for public organizations to choose environmentally worse, "conventional" products. Accordingly, such an anti-science basis would degrade the valuable Nordic ecolabel into a falsification of its proclaimed environmental purposes. In addition, it would act as a disincentive to developers of new environmentally sustainable products that may rely, entirely or to some lesser extent, on the use of GM plants.

Any environmental certificate should be based on scientific evidence. There is no scientific evidence for this discrimination of novel biological methods. Such discrimination jeopardizes technological development and the future of applied bioresearch necessary for environmental protection in the Nordic countries and on the global scene, where the Nordic countries could have a big role in setting an example for sustainable development.

An eco-label that is firmly based on the best available knowledge is of enormous value for consumers, producers and the sustainable development of the Nordic region. It is regrettable if its value is jeopardized by unfounded, unsustainable anti-technology sentiments in its criteria.

In the development of GM crop regulation and product certification, the assessments and requirements

should be based on scientific principles, as the scientific community has long been emphasizing. We should concentrate on the end products of development, that is, on the **characteristics** of these crops and any products derived from them rather than individual components of the processes used in their development.[2]

[1] Review: Towards much more efficient biofuel crops – can sugarcane pave the way? GM Crops 2010; 1: 181–198 <http://www.landesbioscience.com/journals/gmcrops/02TammissolaGMC1-4.pdf>

[2] Appeal for an equal coexistence of various production methods and against banning of GM technology in Finland. The undersigned include 584 names of which 328 are PhDs and 217 at least associate professors, 147 professors, 3 research directors, 8 university deans, 11 heads of research institutes/organizations, 13 university principals, 2 university chancellors and one science academician in Finland. <http://www.geenit.fi/GeneAppealFinland2011.pdf>

further comment/documentation are enclosed

Reply Feb. 23, 2011 from:

Name: Jussi Tammissola, Associate Professor in Plant Breeding  
Company: University of Helsinki, Finland  
Address: jussi.tammissola@helsinki.fi  
Telephone: +358405155120