

**YOU
HAVE THE
RIGHT
TO KNOW**



GREENPEACE

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Greenpeace believes that GMOs should not be released into the environment as there is not adequate scientific understanding of their impact on the environment and human health.

We campaign for creating a paradigm shift in agricultural production to transform how politicians, industry, media and the public see agriculture and to provide incentives- to replace the industrial agriculture of corporate control, monoculture, genetically engineered crops, and synthetic agrochemical inputs with sustainable farming that has low external inputs, enhances agro-diversity, protects biodiversity and helps meet local food and employment needs.

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CONSUMERS' GUIDE TO GMO-FREE FOOD

OVERVIEW

In this second version of the Safe Food Guide, Greenpeace reassesses the scenario in India with respect to the use of genetically modified organisms, consumer attitudes towards GMOs and behaviour of popular food brands.

On February 9, this year, Minister of State for Environment and Forests (I/C) Jairam Ramesh announced an indefinite moratorium on introducing Bt brinjal — the first genetically modified crop for commercial cultivation in India.

The minister expressly specified that the moratorium would be applicable till the time independent scientific studies establish the safety of the product and its long term impact on human health and environment to the satisfaction of the public and the scientist community. Without a doubt, there is growing opposition to genetically modified foods across all fragments of society - consumers, markets, governments and scientists from not just in India but across the world.

Ten State governments wrote to the Central government clearly stating that they would not permit Bt brinjal to be commercially cultivated in their state. In fact, states like Kerala and Sikkim adopted an organic agriculture policy even before the issue of Bt brinjal was opened to a public consultation.

In this guide, we would like to unravel and highlight consumer attitudes towards GMOs in India. In 2010, in consumer opinion poll conducted by GfK Mode, over half of the citizens questioned in India (53%) said they would reject food containing GMOs. In fact, a majority (77%) have shown a preference for foods that come from ecologically grown sources. Moreover, irrespective of their awareness or knowledge levels, a majority (69%) want packaged food to declare through labelling whether or not it contains genetically modified organisms. 61% people want labelling on unprocessed (fruits, vegetables etc.) and unpackaged foods as well. Several studies and polls have established that the attitude towards GE foods is similar in several other countries over a period of time.

With the moratorium on Bt brinjal in place, there is no genetically modified food crop that is commercially cultivated in India. However, this does not rule out genetic contamination of our foods from unmonitored open air field trials or the

unchecked import of raw food grains. More than 11 major food crops have been grown at hundreds of acres across the country, posing a real danger of contamination to consumers and food businesses. Imports of crops soya, canola and corn and their derivatives from US, Argentina, Brazil and Canada, the only countries where GM versions of these crops are grown extensively, go unchecked, and collectively they pose a significant contamination threat. Also, moratorium does not indicate how responsibly food brands or food processing companies will act in the current situation or in the future.

Since the printing of the first Safe Food Guide, we have contacted 25 popular food brands and food processing companies and asked them in detail about their policies on the use of GMOs. The ranks of these companies, which are based on the company's responses to Greenpeace, have been reflected in the guide. We have increased our scope since the last time, to see not only what companies have stated in their responses to Greenpeace but how this is reflected in practice. It also takes into account broadly how much information companies are willing to share with their consumers, if they are practicing double standards and how they are likely to act in future if government regulations on GM foods change.

If KRBL Limited, Vippy Soya, Dabur India Limited (ranked as green in the guide) can show their commitment to consumers, what is stopping the rest? For instance, Heinz, LT Food Ltd., Bambino Agro Limited, Cadbury, Safal (Mother Dairy), suggest that they are committed to sourcing ingredients that are GMO-free. This is great, but they have not announced this in the long-term policy and neither do they indicate this on the labels. Unless they are transparent about their policies and willing to demonstrate their commitment to their consumers through action, they will be in a grey area! Therefore they have been ranked as yellow in this guide. The worst of the lot include MTR Foods, Ruchi Soya, Haldiram's, Nestle, Britannia Ltd., Bharati Enterprises (FieldFresh), Parle Agro, Godrej Agro Limited, PepsiCo, ITC, AgroTech, Cargill, Surya Foods, Amul, HUL, GSK and Kellogg because they are either complacent or not committed to their consumers. The detailed parameters, which have been used to rank companies, have been listed in the guide.



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This guide is to serve consumers across the country to make informed choices while purchasing foods taking into account brands that are either popular or have a significant share in the market. Additionally, we have indicated general pointers to look for what could possibly contain GMOs, and that consumers can keep in mind while purchasing any foods.

Even though there is only a small chance that GM foods could be present in the market today, choosing a food brand, which adopts a position is a right way forward to keep ourselves safe from the threat of GM foods. This is also to remind all the food brands that consumers in India want their food GM free.

CITIZENS WANT ECOLOGICALLY GROWN FOOD, NOT GENETICALLY MODIFIED FOOD

Over the last one year, there has been a spurt of information on genetically modified foods/organisms. With Union minister for Environment and Forests, Jairam Ramesh stepping in and making the otherwise obscure process on the approval of genetically modified foods transparent, citizens got a platform to voice their opinion on Bt brinjal, and other GMOs.

Citizens across the country raised their concerns on Bt brinjal and Genetically Modified food crops during the public consultations that were conducted by Minister Jairam Ramesh in Ahmedabad, Bangalore, Chandigarh, Bhubaneswar, Nagpur, Hyderabad and Kolkata. These included submissions by academics, farmers, medical practitioners/health experts, housewives, students and consumer associations and other civil society groups and played a significant role in the Government's decision to ask for a moratorium on Bt brinjal.

However, in the wake of the moratorium, there is a clear move both on the part of seed companies and the government

to bring genetically modified food crops into the country. At the time of printing this guide, the Union Government is in the process of tabling a bill called Biotechnology Regulatory Authority of India Bill (BRAI). This bill is basically being pushed by the Ministry of Science and Technology to ensure smooth approval of GM crops in the country. The new BRAI along with other draconian clauses also proposes to ease the approval of genetically modified crops without Indian citizens with any choice in the matter. Moreover, the lack of transparency will make it impossible for citizens to have access to any information related to genetically modified crops prior to their approval.

At this juncture Greenpeace sought to assess the awareness, attitude and preferences of citizens towards safe food in general and genetically engineered food in specific, and the proposed regulatory system through a public opinion poll, which was conducted by GfK Mode.

PUBLIC OPINION POLL ON GE FOODS: A STUDY BY GfK MODE

Objectives of the survey

1. To assess the public perception and awareness of GE produce and Bt brinjal
2. To assess the preferences of consumers towards modes of food production.

Targeted respondents and audience of the survey

The targeted respondents of the poll are representative of the urban populace of India. It was done across 6 cities representing each region in the country - North- New Delhi, West- Mumbai, South- Bengaluru, Central – Indore and North East- Guwahati.

Results

The poll, conducted by an independent market research company GfK Mode gives a much needed perspective on citizens' views on GM foods. 5,599 citizens across various socio-economic levels, age, literacy levels and income groups in the aforementioned cities were interviewed for the purpose of this poll.

OPINION POLL HIGHLIGHTS

Awareness on GM foods is low as compared to other environment or public issues. About 33% of the people have heard about either Bt brinjal or GM foods. And close to half (49%) are aware of either – Bt brinjal or Genetically Modified foods.

Findings: When compared to their knowledge on other issues such as global warming, swine flu, protection of endangered species, forest conservation, a third (33%) of the representative sample seems to be aware of genetically modified foods. This by no means is a small percentage.

Irrespective of their awareness or knowledge levels, a majority (69%) want packaged food to declare through labelling whether or not it contains genetically modified organisms.

61% people want labelling on unpackaged (unprocessed foods like fruits and vegetables and processed but unpackaged foods like grains etc.) foods as well.

Findings: A majority of the representative population has expressed that like all other information relating to food, they are entitled to know whether the food does contain GMOs. This is irrespective of their knowledge levels. It is also regardless of whether it is processed and packaged or unpackaged. While there is no law, which makes it mandatory for companies to share this information through labelling of their products, a few responsible companies are already taking such steps. Clearly, they respect consumer rights, and are moving in the right direction.

It is also important to note that genetically modified foods do not look or taste different, which makes it impossible for consumers to tell them apart. In order to make sure that consumers can make an informed choice, companies should label their products as 'GMO' or GMO-free.

From the above statistics, it is clear that consumers would also like to know whether fruits, vegetables and the like, which are largely sold loose, are genetically modified. Since the open air cultivation of any GM crops would lead to irreversible contamination of regular crops, the only way to keep our food free from GM crops is to stop any open air release either for experiments or for commercial cultivation.

Over half of the citizens questioned in India (53%) said they would reject food containing GMOs.

Findings: There is a growing rejection of GM foods across the world. Clearly, a majority in India have clearly stated that they would reject genetically modified foods. Like in other parts of the world where governments and markets have responded to this preference, citizens' demands and preferences should be respected.

A majority (77%) have shown a preference for foods that come from ecologically grown sources.

Findings: A whopping majority of individuals in the study have clearly stated that they would prefer food which is procured from ecologically grown sources. This is over food produced using chemical fertilisers, pesticides etc. and possibly GE/GM seeds in the future. Organically or ecologically grown foods, which do not entail the use of chemical pesticides or fertilisers or even genetically modified foods are preferred by the masses.

The opinion of the citizens must be seen in context of how companies operate, and whether they respect consumer demands and their rights.

HOW TO AVOID GMO FOOD BRANDS?

The Safe Food Guide has categorised 25 food companies based on their popularity and their share in the market. This does not mean that other food brands or food processing companies are exempt from this. Here are a few tips that could help consumers to know what to look for in order to avoid GMOs in processed/packaged food.

1

SAFE FOOD GUIDE
POCKET VERSION

Keep the pocket version of the Safe Food Guide as a ready reference. This should give you a good idea about most popular brands available in the market. However, since it is not possible to cover each brand/food company, here are some general tips, which you can keep in mind in order to avoid processed/packaged foods containing GMOs.

2

LOOK FOR LABELS –
'NO GMOS', 'GMO-FREE'

As of now, food companies in India are not required to label their products. However, a number of responsible companies are voluntarily labelling products as “non-GMO”, “GMO-free” or packages stating that it does not contain GMOs.

3

LOOK OUT FOR
AT-RISK INGREDIENTS

While there have been many field trials of different GE crops around the world, large-scale commercial cultivation is largely restricted to corn, canola, and soy in the following countries: Corn (Argentina, Canada, Mexico, USA, Brazil), Soy (Argentina, Canada, USA, Brazil) and Canola (US and Canada). Some of the most common genetically engineered ingredients from these crops that are found in processed foods are:

Corn

- Corn flour, meal, oil, starch, gluten, and syrup
- Sweeteners such as fructose, dextrose, and glucose
- Modified food starch*

Soy

- Soy flour, lecithin, protein, isolate, and isoflavone
- Vegetable oil* and vegetable protein*
- Canola oil (also called rapeseed oil)

*This could be derived from other sources

4

PURCHASE
ORGANIC PRODUCTS

Rest assured, certified organic products will be free of GMOs. Organic products are typically labelled as ‘100% Organic’. Many farmers practise organic farming, also have to certify themselves as organic under community certification procedures notified by the government. The produce from such organic farmers are marketed by farmers’ co-operatives and several local entrepreneurs. Buying products from such locations also helps the farmer directly as profits are not lost to middlemen. Please note, products that are ‘made from organic ingredients’ may not be 100% organic, which leaves some scope of it either containing GMOs/ingredients derived from GMOs or being contaminated during procurement or production.

Summary of at-risk ingredients food

- Soy and corn food products imported from the USA or Argentina;
- Edible oils that contain corn or soy oil from USA, Argentina and Brazil.

HOW RESPONSIBLE IS YOUR FAVOURITE FOOD BRAND?



PARAMETERS USED FOR RANKING COMPANIES IN THIS GUIDE

Much has changed since the publishing of the first Safe Food Guide last year. Bt brinjal, the first genetically modified food crop has been put on hold. The minister of environment and forests called for an indefinite moratorium on Bt brinjal earlier this year. That does not, however, mean that food companies can be complacent and get away with trite remarks. Even though no genetically modified food crops are commercially cultivated in India, there are more than 11 major food crops undergoing field trials across the country. These are unmonitored and open air field trials and threaten to contaminate our food chains, as do unchecked import of raw food grains. It is precisely for these reasons that a detailed questionnaire was sent to each of the companies that are ranked in the guide.

It might be necessary to emphasise that while there are innumerable parameters to assess safe and sustainable

food, this guide will focus only on parameters related to the use of genetically engineered foods in India.

In this report, we have categorized companies strictly based on their responses to each of their questions in the questionnaire shared below. Using this as a starting point, companies are listed anywhere between Green and Red, which stand for extremely responsible to callous companies who undermine consumer rights and rather place a premium over profits. Somewhere in between fall the companies that have been marked as yellow/amber. These represent companies that could drift towards either end of the spectrum – red or green. Consumers should keep a watch out for them, until they not only declare their GM-free policy, but openly and transparently share this with their consumers.

QUESTIONNAIRE SENT TO COMPANIES

1. Name of the company as registered in India
2. A list of all the consumable food products manufactured by your company, categorised as follows:
 - Baby Food
 - Beverages
 - Confectioneries
 - Cereals and Breakfast Foods
 - Condiments/Sauces/Pickles
 - Biscuits/Cookies and Other Desserts
 - Dried Meals/Ready-to-eat foods/Soups
 - Frozen Foods – Fruits and Vegetables
 - Grains/Pulses/Lentils
 - Pastas/Noodles
 - Edible Oils & Oil Products
 - Sweets and Savouries/Namkeens
 - Meat/ Poultry/ Meat/ Poultry-based products.
 - Dairy products (including ice-creams)
 - Spices/Seasonings
 - Malted foods/malted beverages (non-alcoholic)
3. Does your company currently use any genetically modified organisms – raw or processed as ingredients for the manufacture/processing of your product/s? YES/NO

If yes, please specify the products and the ingredients.
4. If your company does not use GMOs in its products, confirm the following:
 - a. Could you specify the means by which the company verifies/confirms the absence of GMOs
 - i. Self certification YES/NO
 - ii. Verification through Third Party Testing (TPTs) – YES/NO
 - b. Could you specify if your company imports any ingredients (raw or processed) for food or feed, and which could potentially contain GMOs. YES/NO
 - c. If your company sells poultry/poultry-related products, does your company use genetically modified feed for the poultry. YES/NO
5. If your company does not use GMOs in its products, confirm the following:
 - a. Has your company already taken steps to share this information? YES/NO
 - b. Would your company take proactive steps in informing it's customers about its GMO-free status through labelling, irrespective of government policy requiring you to do so? YES/NO
 - c. Has this information been announced on the company's Indian website? YES/NO
 - d. Does your company label its products as GMO-free in India? YES/NO
 - e. Has your company announced its GM-free stance in the company's annual report? YES/NO
 - f. Has your company incorporated its GM-free position as a part of its long-term policy? YES/NO
 - g. Could you specify if your company would continue to maintain its GMO-free position in the long-term, irrespective of government policy requiring you to do so? YES/NO
6. If your company has its presence outside of India, please confirm the following:
 - a. Has your company conformed to a GMO-free status in any other part of the world? YES/NO
 - b. If yes, list the countries in which your company is either registered and/or sells its products.
 - c. If your company conforms to a GMO-free status in any other part of the world, would it also choose to maintain the same status in India, irrespective of the policies and requirements here? YES/NO
7. Currently there are no requirements from the government for labelling. In this scenario, which of the following initiatives is your company most inclined to take:
 - a. Request through formal communication, the government, to take steps in this matter. YES/NO
 - b. Work through industry associations for a labelling law, which would regulate all matters relating to the use of GMOs.

RANKING OF FOOD BRANDS

As mentioned earlier, in this second version of the Safe Food Guide, Greenpeace has increased the scope to include additional food brands, and the willingness of these companies to walk the talk rather than merely state their current position on GMOs. Twenty-five of the most popular food brands, who hold major share in the branded food market, including 17 from the last time, were contacted this time.

A standard questionnaire seen in the previous page was sent to each of these 25 companies, in order to broadly understand:

- Their current stand on the use of Genetically Modified Organisms.
- Cross-checking mechanisms adopted by those companies who do not use GMOs.
- Transparency – willingness to share a company’s GMO-free status with consumers through various media.
- To understand their future course of action with respect to the use of GMOs.

- To understand if food brands have differential operating mechanisms in different countries. (this is to ascertain if they practice double standards in different countries.)
- If companies are proactive to take action and initiate dialogue with the government directly or through industry associations to ensure that the market remains GM food free.

NO COMPROMISING MATTER

As mentioned earlier, companies have been categorised into Red, Yellow/Amber and Green.

What you see in the spectrum here is where your favourite food brand lies along with the parameters used to reach a conclusion as to where companies are situated on the spectrum. Since it is food that we are dealing with, we have chosen to use as stringent parameters as possible to categorise these companies. Companies have been ranked based on either written declarations or emails that Greenpeace received from them.



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THE RED LIST



Enlisted here are companies who have not taken issue of GM food seriously. Hence, they have not taken concrete steps to provide Indian consumers with GM free food now and in future thereby being irresponsible to Indian consumers. We have included them in the Red List after making our best efforts possible - writing to them, following up with phone calls and emails. This list includes:

CATEGORY RED: COMPANIES THAT ARE IRRESPONSIBLE:

Amul India
Cargill India Private Limited
Godrej Hersheys or Godrej Beverages and Foods Limited
Surya Foods
Agro Tech Foods Limited
Bharti Enterprises
Hindustan Unilever Limited
Kellogg
Nestle
Parle Biscuits Private Limited
PepsiCo
Haldiram's
MTR Foods
Britannia Industries Limited
Safal/Mother Dairy

PARAMETERS

- Companies that have not responded to Greenpeace despite repeated calls/follow-ups for over a month.
- Companies that have responded to Greenpeace, but have mentioned nothing about their stand on using genetically modified ingredients in their foods.
- Companies that have stated that they do not currently use GMOs as of today, but do not find it necessary to remain so in future.
- Companies who are not transparent about their decisions and unwilling to share it with consumers either through their website, or their annual report or labelling of their products, and thereby have violated consumer rights.
- Companies who are unwilling to engage with the government or industry associations and initiate any discussion on GMOs with respect to food safety.

There is no guarantee that the companies who have not responded to Greenpeace do not use GMOs in their products. Consumers will be forced to believe so, unless they clarify otherwise. We alert consumers to keep an eye out for their products.

THE YELLOW LIST



Companies are in yellow as they have taken certain initiatives towards keeping the Indian food market GM-free. But there is room for improvement as they have not gone the full stretch to ensure this. These are companies that have met some or all parameters given in the table below.

CATEGORY YELLOW: COMPANIES TO KEEP AN EYE OUT FOR

Cadbury India Limited
ITC Limited
Ruchi Soya Industries
L T Foods Limited
Heinz India Private Limited
Bambino Agro Industries
Kohinoor Foods Limited

PARAMETERS

- Companies that have shown an inclination of taking a long term position and declaring themselves as GMO-free.
- Further, some of these have taken steps to ensure that nothing enters their production chain either through imports of raw materials from countries that permit GMOs or from field trial contamination, all of which is guaranteed through either self certification or rigorous third party testing.
- These companies are GM-free as of today. Some of these have shown an inclination to sharing their stance with consumers. However, they have not taken concrete steps in this direction. This means that because they are not committed to consumers, and they could change their stance in the future. Some of these companies have suggested that they would
- be vaguely willing to engage with the industry to take these matters forward.

Although companies in this list do not currently use GMOs, they have to be more proactive in taking long-term position on being GM free and become transparent when it comes to letting their GM free position known to consumers. They could move towards either end of the spectrum – Red or Green unless they indicate otherwise.

THE GREEN LIST:



The set of companies represented in this list have not only taken the necessary steps to ensure that they remain GM-free in the future but also are ready to take initiatives to engage with the government and Industry associations to keep the Indian food market free from GM food. This list includes:

CATEGORY GREEN: COMPANIES THAT ARE RESPONSIBLE: PARAMETERS

Vippy Industries Limited
KRBL Limited
Dabur India Limited

- These companies are progressive since they have a declared policy not to use GM ingredients at any point of time - now or in the future.
- Further, some of these have taken steps to ensure that nothing enters their production chain either through imports of raw materials from countries that permit GMOs or from field trial contamination, all of which is guaranteed through either self certification or rigorous third party testing.
- They also include companies, which have taken voluntary and concrete steps towards their GMO-free position to consumers through their website, annual reports or labelling of their products or through all media.
- As responsible companies, they are also willing to come together and demand that the government's Food Safety and Standards Authority of India (FSSAI) or industry associations take up food safety issues related to the consumption of GMOs.

Most of the companies fall between deep green and lighter green based on their proactive nature.

Of the 25 companies Greenpeace contacted, listed here are the most responsible companies, and here's why:

Dabur India Limited is one of the more responsible companies that has not only assured us that they are GMO-free as of today, but have also taken their first steps to make their stance public. They have also guaranteed Greenpeace that their intention is to remain free of GMOs in the future, and in whichever countries they operate or export. They will also take steps to initiate a dialogue with the government or industry bodies for this. However, they are not at par with the other two companies in this category, who are far more proactive on this front.

Vippy Soya Limited and KRBL Limited can be considered as the most responsible of the 25 companies leading the way for the rest. They have assured us that they do not use GMOs and will never do so in the future. They have also taken proactive and sometimes voluntary steps to share their stance with consumers. These companies intend to act equally responsible with consumers across various countries across the world, and will initiate a dialogue to this effect with both industry associations and the government.

The other 23 companies should take cue from both Vippy Soya and KRBL and take steps to act responsibly and move towards this position to gain the confidence of consumers across the country. Companies can clarify or update their position by writing to us within a month, starting September 1, 2010. Their new position will be reflected in the next Safe Food Guide.

In the meanwhile, consumers are urged to log onto www.safefoodnow.org and write to their favourite food brands urging them to act responsibly. You can also tell us names of companies you think should be included in the next Safe Food Guide, and we will

GUARANTEEING GMO-FREE FOOD

While this guide can provide a good basis for avoiding GE food, the only way we can ensure that our food remains completely free from GM ingredients is to stop any environmental release of GMOs including experimental trials and put in place a rigorous system in place at ports of import to stop GM food ingredients from being imported into the country.

It is also essential to note that while this is an attempt to be as comprehensive in its approach in order to identify companies adopting a GM-free policy, there are several parameters Greenpeace will take into account in the future to ensure companies keep their promises to consumers. In future, this guide will increase its scope into identifying and classifying companies on their positions on agricultural practices and its impact on health, environment and livelihoods, in sync with the vision of sustainable agriculture.

Greenpeace is a global organisation that uses non-violent direct action to tackle the most crucial threats to our planet's biodiversity and environment. Greenpeace is a non-profit organisation, present in 40 countries across Europe, The Americas, Asia and the Pacific.

It speaks for 2.8 million supporters worldwide, and inspires many millions more to take action every day. To maintain its independence, Greenpeace does not accept donations from governments or corporations but relies on contributions from individual supporters and foundation grants.

Greenpeace has been campaigning against environmental degradation since 1971 when a small boat of volunteers and journalists sailed into Amchitka, an area north of Alaska, where the US Government was conducting underground nuclear tests. This tradition of 'bearing witness' in a non-violent manner continues today, and ships are an important part of all its campaign work.

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