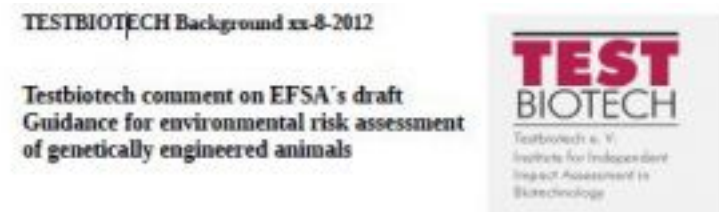


# Testbiotech comment on EFSA's draft Guidance for environmental risk assessment of genetically engineered animals

## Logo:



EFSA's Guidance suffers from a major imbalance between factual risks and the risk assessment as proposed - there is no general framework for risk analysis of genetically engineered animals

Christoph Then

Testbiotech comment on: EFSA (2012) draft Guidance on the environmental risk assessment of genetically modified animals EFSA Panel on Genetically Modified Organisms (GMO), Available online: [www.efsa.europa.eu/efsa/journal/European\\_Food\\_Safety\\_Authority\\_\(EFSA\)](http://www.efsa.europa.eu/efsa/journal/European_Food_Safety_Authority_(EFSA))

### 1. Terms of reference as provided by the European Commission and scope of the draft Guidance

Any guidance on risk assessment of genetically engineered animals must be incorporated in an overall framework of risk analysis, integrating aspects of ethics, interests of consumers, the future of agriculture and specific issues of animal welfare.

Animals are emotionally sensitive living beings and as such protected by animal welfare regulations. Therefore, introducing genetically engineered animals to the markets cannot be done in the same way as, for example, genetically engineered microorganisms.

Opinion polls show that genetic engineering and cloning of animals for food production is a very delicate area that deserves special attention. Many people object to the idea generally of genetically engineering vertebrates to meet economic interests in food production or for fanciful purposes.

Genetic engineering interferes with the integrity of the animals on several levels: the integrity of the genome, of the cell, of the individual animal and the overall population. Especially in regard to vertebrates, the ethical debate must not only be about issues of animal welfare, but also take into consideration the integrity of the intrinsic value of animals. To which extent these ethical questions are considered in existing animal welfare legislation has to be discussed in detail before any genetically engineered animals might be allowed to enter the market.

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[Testbiotech Comment on ERA of GE animals.pdf](#) [1]

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187.45 KB

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