A Purchasing Guide to Sourcing Food Produced Without Genetically Engineered Ingredients

urchasers can take the following steps to source foods produced without the use of genetically engineered (GE) ingredients (also called "genetically modified" or "GMOs").

Step 1: Understanding which foods may have GE ingredients

Only four GE crops, corn, soy, canola and cotton, are widely grown. So most fresh fruits and vegetables, whole grains, beans and other single-ingredient products will not be suspect for GE ingredients. However, thousands of processed foods contain ingredients that are likely to come from GE crops. For example, the soy oil in salad dressings is likely to come from GE soy and corn syrup in puddings or sauces is likely from GE corn (for other common GE ingredients, see sidebar). By assessing the ingredients of the processed foods that your facility buys, you can create a list of foods that potentially contain GE ingredients, and focus your (and your suppliers') attention on these products.

Step 2: Identifying foods with potential GE ingredients

These four GE crops provide the foundation for an assessment of the foods that your facility buys which may potentially contain GE ingredients. As there are thousands of processed foods (foods with multiple ingredients) that contain ingredients from soy, corn and canola, the list of potential GE foods may be extensive. As a first step, buyers may want to focus on products that are easily identified and for which non-GE substitutes are available. For example, there are many organic varieties of corn tortillas

GE Crops and GE Food

While only four GE crops are widely grown, these crops—corn, soybeans, canola and cotton—are found as ingredients in thousands of processed foods. Corn syrup, for example, is found in foods from soft drinks to lunch meats. In 2006, nearly 90% of U.S. soybeans were from GE varieties; 60% of corn and at least 50% of canola (mostly from Canada) were also from GE seed. Cotton, used sometimes in food as cottonseed oil, was also over 80% from GE varieties.

Following is a partial list of food ingredients that are often from these crops. Unless suppliers can verify that these ingredients are from non-GE sources (for example, by demonstrating that the ingredients are organically grown, or grown from non-GE seed and distributed via a supplier using a non-GE identity-preservation system), buyers should assume that these ingredients are from GE crops.

- Corn: Corn syrup, high fructose corn syrup (HFCS), dextrose (glucose, glucose solids, or d-glucose), sorbitol, maltodextrin, crystalline fructose, cornstarch, modified food starch, cornmeal (masa, grits, polenta, corn flour), corn oil, mono- and di-glycerides, corn gluten, corn bran.
- Soy: Soy oil, soy milk, soy protein concentrates, isolated soy proteins, texturized vegetable protein (TVP), soy flour, soy lecithin.
- Canola: canola oil
- Cotton: cottonseed oil

and chips that can replace GE varieties; safflower oil or other vegetable oils can replace soy, canola or corn oil.

Self-assessment

Once you have identified the products that you purchase that contain ingredients from corn, soy, canola or cotton, you will need to communicate to suppliers your preference for non-GE versions of these foods. You might start by asking for your suppliers' policy on GE food. You can state your preference and ask for specific non-GE products by sending current and prospective suppliers your list of potential GE foods, along with a letter and questionnaire (a sample letter, questionnaire, and Q&A can be found on pages 3 and 4). You may also include a preference for non-GE foods when soliciting bids for future contracts.

GPO, Distributor Supported Assessment— Using Your Purchasing Power

Almost all hospitals and/or their health systems purchase through Group Purchasing Organizations (GPOs) and are supplied by institutional food distributors. Your GPO can help you develop a list of potential GE foods through their direct contracted relationship with large food distributors and other food suppliers. Furthermore, food distributors often have private label products. As customer support, they should help your facility assess the multitude of foods they provide to you.

Step 3: Communicating with the supply chain: GPOs, Distributors, Food Service Contractors, and the Food Industry

Your interests and needs must be communicated to those under contract with your facility. Some suppliers may try to accommodate your request but may not know much about GE foods and may need basic education (many good resources are listed below). Other suppliers may know the concerns but may find it difficult to source non-GE versions of some foods. Purchasers should determine before they contact suppliers their preferred timeline for phasing out current GE food products, and should be prepared to work with suppliers to identify those products for which non-GE versions may be more easily found or created. "Housebrand" products may be a good place to start, as suppliers can more easily control the ingredients used for their own private-label foods. Some ingredients are also more easily found or substituted for than others. For example, it is often simple to replace soy or corn oil with other vegetable oils, but it can be difficult to replace corn syrup or soy proteins in some products.

Step 4: Verification

By definition, all U.S.D.A. certified organic foods are verified by third party organic certifiers as having been produced without GE seed. Purchasers can therefore rely on organic as verification of non-GE status.

The Non-GE Food Supply Chain

Suppliers that provide non-GE foods usually do so by systems that separate and/or trace ingredients from non-GE crops through the food processing and distribution chain. Some non-GE producers assure that ingredients are pure through segregation of non-GE from commingled products. This may involve processing non-GE products at different times and cleaning bins and production lines between non-GE and GE batches. Other systems maintain non-GE purity more thoroughly via "identity preservation" (IP). In IP systems, dedicated equipment, storage bins, processing facilities, etc. are used to isolate non-GE products from seed to table. IP systems also often maintain traceability of non-GE foods, so the final product can be traced back to the non-GE seed used on a specific farm. They also may use DNA testing throughout the system, to meet non-GE purity standards.

There are also suppliers that may offer non-GE products that are not organic. Since there is currently no third-party certification solely for non-GE products, purchasers need to use other means to determine the validity of suppliers' non-GE claims, such as:

- requesting written assurance from the supplier that no GE ingredients were used in producing the product;
- requesting suppliers' submit information regarding the means they use to verify non-GE status, such as a review of producers' identity-preservation systems (see "The Non-GE Food Supply Chain" above).

Step 5: Practical considerations

Some suppliers may assert that they would like to provide non-GE versions of their products but that doing so is impractical given their supply chain. It is true that making the changes needed to provide non-GE foods can be complex. Large suppliers offer thousands of products from hundreds of companies, who each in turn use dozens or hundreds of suppliers for raw ingredients. Still, suppliers that offer private label branded products can insist that all of the ingredients used in these products are from non-GE crops. Also, many U.S. food companies, including at least one major institutional food distributor, sells non-GE food in Europe and elsewhere in the world but have not made these foods available in the U.S.

Large companies can exert their buying power to influence suppliers away from GE ingredients. For example, in 2000, reports revealed that Frito Lay had stopped using GE corn by requiring growers to avoid GE seed, while pressure from McDonalds and other large buyers pushed GE potatoes off the market. Health care buyers can support their suppliers in demanding down-the-line changes towards non-GE ingredients.

Model Letter Requesting Non-GE Foods

A template for this model letter can be found as a Microsoft Word document at www.healthyfoodinhealthcare.org.

Date
XYZ Food Service Street Address City, State ZIP
Dear,
As a health care provider, we believe it is important to model a preventive health approach through the food we purchase and serve. Such an approach recognizes potential impacts to our patients, staff, and visitors, and equally to local and global communities from the way in which food is produced and distributed.
Our patients, staff, and visitors want safe food for their families and children. Many consumers are concerned about the use of genetic engineering (GE) in food production, and many doctors and scientists have expressed concerns about health risks from GE foods. For example, an editorial in the <i>New England Journal of Medicine</i> stated that the risk of allergies from GE foods is "uncertain, unpredictable, and untestable." Environmental concerns also abound with GE crops. The widespread adoption of GE crops in the U.S. is responsible for a major increase in pesticides used by farmers, and has hastened the spread of uncontrollable weeds, forcing farmers to use even higher rates of toxic chemicals on our food.
In light of the public health and environmental concerns associated with the use of GE foods, and in recognition of our patient and staff preferences, we have decided to avoid GE foods and whenever possible to source foods that have been produced without the use of ingredients from GE crops. We are anxious to work with you towards a plan for determining which foods that you carry contain GE ingredients, and for substituting non-GE alternatives or eliminating these foods from our purchasing. We request your response to the enclosed questionnaire by [due date].
Thank you for your attention to this important concern.
Sincerely,
Your Name Your Institution

Sample Questionnaire

A template for this questionnaire can be found as a Microsoft Word document at www.healthyfoodinhealthcare.org.

Please return by [date] to [email/fax/mailing address]

- 1. Does your company have a policy on genetically engineered foods?
 - O Yes (if yes, please enclose a copy of the policy with your response)
 - O No
- 2. Does your company support the customers' right to know if foods are made with genetically engineered ingredients?
 - O Yes
 - O No
 - O We have no position
- 3. Does your company use GE ingredients in its private label products? (please circle one)
 - O Yes, we use GE ingredients.
 - O No, we prohibit the use of GE ingredients in all of our private label products.
 - O We prohibit the use of GE ingredients in some of our private label products (please specify).
- 4. Attached is a list of some of the products that we purchase from your company that are made with ingredients from corn, soy, canola, and/or cottonseed (the most widely grown GE crops). We would like to know which of these products are made with ingredients from GE crops, as we would like to avoid products with GE ingredients. For the products

listed in the attachment, please indicate if they are or are not made with GE ingredients.

- O All of the products listed are made with GE ingredients.
- O Some of these products listed are made with GE ingredients, some are non-GE products (please circle the non-GE products, and see question 5)
- O None of these products are made with GE ingredients (see question 5)
- 5. What steps does your company take to ascertain and verify that products exclude ingredients from GE crops, and to identify non-GE products for your customers? (circle all that apply)
 - O We designate in our catalogue which products contain GE ingredients and/or which ones are non-GE products.
 - O We request written assurance from producers who offer non-GE products.
 - O We request information on identity preservation systems or other approaches producers use to assure that their products are from non-GE crops.
 - O We offer certified-organic products as alternatives to products made with GE ingredients.
 - O Other (please specify)

Questions and Answers on [hospital name] GE Food Policy and Implementation

A template for this Q&A can be found as a Microsoft Word document at www.healthyfoodinhealthcare.org.

Q: What is genetically engineered food?

A: For about a decade, companies have introduced genetically engineered (GE) foods into the marketplace. Going beyond traditional breeding, GE technologies artificially manipulate and transfer genes into the food supply that have never before been part of the human diet, producing foods that would not otherwise occur in nature.

Q: What are the risks of genetically engineered foods?

A: Scientists have raised many concerns about the risks of GE foods, yet there are few long-term studies to assure that consumption of GE foods will carry no adverse

long-term health impacts. Genetic engineering could create new food allergies, unexpected toxins in foods, and hasten the spread of antibiotic resistant diseases. GE crops also create environmental problems and can contaminate natural and organic foods.

Q: Why is buying non-GE food important to [hospital name]?

A: As a health care leader, it is our responsibility to adopt best practices for the health of our patients, staff, and the community throughout our operations.

Q: Aren't GE foods approved by the Food and Drug Administration?

A: The FDA has no formal approval

process for GE foods, but relies on biotechnology companies—the companies that profit from the sale of GE crops—to assess their safety. Many GE foods marketed in the U.S. are banned or strictly regulated in Europe, Japan, and other regions.

Q: How will [hospital name] implement its non-GE foods policy?

A: We are surveying our suppliers and looking for sources that will provide us with non-GE foods. We hope to establish a supply of predominantly non-GE products as soon as is practical. Ultimately we hope to establish a non-GE supplier for all of the foods we purchase.

Resources

Resources on GE Food

Available at the HCWH Healthy Food in Health Care Website: www.healthyfoodinhealthcare.org

HCWH Position Statement on GE Food: This document includes background and scientific rationale for our position opposing the use of GE foods. See the full statement at http://www.noharm.org/details.cfm?ID=1540&type=document

Health Care Without Harm Position Statement on rBGH: This document includes background and scientific rationale for our position opposing the use of rBGH.

A Purchasing Guide to Sourcing Dairy Products Produced Without rBGH: A short guide with background, sample letter, and survey to help assess your dairy supply.

Some Company Policies on GE Food

In the U.S., **Sodexho** catered a biotechnology industry event on the "benefits" of GE foods , but in the UK, the company states that, "It is Sodexho's policy not to use genetically modified food as part of any meal supplied to our clients or customers." See the full UK statement at http://www.sodexho.co.uk/uken/Images/GMO_tcm15-4460.pdf

A group of **Sysco** shareholders introduced resolutions to the company in 2003-05, calling for a report on the company's GE foods and a plan for sourcing non-GE foods. The company's 2003 reply, recommending that shareholders reject the resolution, is at http://sec.edgar-online.com/2003/09/26/0000950129-03-004776/ Section22.asp

U.S. Foodservice is owned by Royal Ahold; Ahold's policy on GE food states that "Ahold believes that consumers have a right to know where their food comes from and how it is made, and that they should be offered a free choice in what they buy. We therefore actively promote labeling of products made with the help of biotechnology." See the full statement at http://www.ahold.com/page/580.aspx#q5

The Whole Foods Markets grocery chain avoids GE ingredients in its private-label products. The company policy on GE foods states, "Our goal at Whole Foods Market is for all our own company branded products to be created from non-genetically engineered ingredients and processes. When developing products, we will intentionally source non-genetically engineered ingredients... Any Whole Foods Market branded products created with only non-genetically engineered ingredients will be labeled as such... We also encourage our branded manufacturers and producers to create products without genetically engineered ingredients...." See the full policy at http://www.wholefoodsmarket.com/issues/list_biotech.html

Institutional Purchasing Policies on GE Food

The City of Seattle School District's policy states that "foods and beverages should, as much as possible, be fresh, locally grown or produced, certified organic, unprocessed, non-GMO (do not contain Genetically Modified Organisms) and nonirradiated, and should not contain additives or preservatives." See the full policy at http://www.seattleschools.org/area/policies/e/e13-01. pdf#search=%22distribution%20and%20sales%20of%20competitive%20foods%209%2F01%2F04%22

The City of San Francisco has resolved to "give preference to caterers that avoid GE ingredients" for all city government food purchasing. See the full resolution at http://www.sfenvironment.org/downloads/library/yengineeredfoodsjuly172000.doc

Other Resources on GE Food

"Your Right to Know"

Andrew Kimbrell, "Your Right to Know: Genetic Engineering and the Secret Changes to Your Food." Earth Aware Editions, April 2007, order online at http://catalog.earthawareeditions.com/catalog/product_info.php/products_id/34?osCsid=5f11ac4c02706bd43fc33a9d5f0194eb

Center for Food Safety

The leading public interest legal advocacy organization working to challenge harmful food production technologies and promoting sustainable alternatives.

http://www.centerforfoodsafety.org/geneticall7.cfm

True Food Network

A grassroots network dedicated to stopping the genetic engineering of our food, farms and future, and working with others to create a socially just, democratic and sustainable food system. http://www.truefoodnow.org/

Union of Concerned Scientists

Working to promote sustainable farming practices while eliminating harmful "factory farming" methods and strengthening government oversight of genetically engineered food.

http://www.ucsusa.org/food_and_environment/genetic_engineering/

Greenpeace

Exposes the environmental and health threats from GE foods; has produced "consumer guides" to non-GE foods for over 20 countries. http://www.greenpeace.org/international/campaigns/genetic-engineering/food

Pesticide Action Network

Genetic engineering online presentation http://www.panna.org/resources/geTutorial.html



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