Consumers Union of Japan and the No! GMO Campaign have published a 16 page booklet called “Are We All Guinea Pigs?! Genome Manipulated Food” The booklet has recently been translated to Chinese.

Consumers Union of Japan has been active in the debate about regulation of GMOs since the mid 1990 and firmly believe the new technologies, such as gene editing, must be strictly regulated.

CUJ’s stance is that any such experiments should be stopped to avoid serious adverse effects on human health and the environment.
**What is the Japanese Government Considering?**

August 20 2018 Draft for the Handling of Living Modified Organisms Obtained through Genome Editing Technologies under the Cartagena Protocol:

<table>
<thead>
<tr>
<th>Host organism does not contain nucleic acids modified outside of the host cell</th>
<th>Nucleic acids modified outside of the (host) cell were transferred to the host</th>
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<td>When used with containment measures, no request for information from the applicants</td>
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<tr>
<td>No remaining and/or replicate of nucleic acids modified in the extracellular space are in the final product</td>
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<tr>
<td>Open environment</td>
<td>Type 1 use: Conduct an assessment of the impact on biodiversity</td>
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<tr>
<td>Request for product information, including the assessment of the potential impact on biodiversity</td>
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<tr>
<td>SDN-1, etc.</td>
<td>SDN-1, SDN-2, SDN-3, etc.</td>
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</table>

LMOs considered to be regulated under the Cartagena Protocol (genetically modified)

Organisms out of scope of the Cartagena Protocol. The relevant ministry will request information on the organism

For the organisms that fall outside of the Cartagena Protocol, the committee drafted a list of information the regulatory agency may wish to obtain. This proposal covers all organisms, not only agricultural crops but also microorganisms, products in the research and development (R&D) process and others. However, there is no detailed information on the depth and scope of information the regulator may seek.

SDN = Site Directed Nuclease (a programmable nuclease that enables gene editing)

Adapted from USDA GAIN Report Number JA 8064 (August 22 2018)
What does Consumers Union of Japan Want?

To:
The Minister of the Environment Nakagawa Masaharu
From:
The No! GMO Campaign
Consumers Union of Japan
Food Safety Citizen’s Watch

August 10 2018

Opinion Statement

Consumers Union of Japan and other NGOs would like to take this opportunity to ask for strict regulations and labelling of all organisms created with genome editing techniques.

New kinds of agricultural, livestock and marine products are being developed today, using new genetic modification techniques such as genome editing and RNA interferometric technologies (“new technologies”) which may have practical use and enter the market. While we have been opposed to the massive use of unsafe GM foods, as well as demanding that they should all be fully labelled, do not consider the new technologies to be safer than GM technologies. We think at least that the new technologies should be regulated in the same way as GM technologies, without exceptions.

1. The safety of the new technologies has not been established
Compared to GM technologies, the new technologies including genome editing are being touted as safe and less random, but there are no such thing as risk-free technologies, and we remain unconvinced that they are as safe as advertised. We consider it essential that foods made with the new technologies should go through even stricter confirmation of safety than the currently approved GM foods.

2. The new technologies cannot be regarded as processes which appears naturally
We do not agree with the viewpoint that since specific genes can be destroyed or disrupted through mutation in the natural world, the same process achieved through genome editing should not be made subject to regulation. In our opinion, the genetic modification through genome editing is different both qualitatively and quantitatively, thus making it intrinsically different from what may happen in the natural world.
3. Regulations for food from new technologies should be integrated with regulations for genetically modified food
For the reasons above, we demand that food from new technologies should be regulated in the same way as GM food, so that the impact on the environment (biological diversity) and human health will be taken into account. Furthermore, we think the category of regulation should be expanded and be called “genetically manipulated food” to include both GM food and food from new technologies.

4. Please make labelling of all food made with new technologies and genetically modified food mandatory
Genome edited food is said to be the same as food undergoing mutations in the natural world, but without mandatory labelling, this cannot be confirmed. We strongly demand that all food made with new technologies should be labelled in the same way as genetically modified food.

* * *

In the News:

“InGov’t committee’s GMO deregulation proposal too hasty: consumer groups, experts”

The Mainichi Newspaper August 21 2018

TOKYO — Consumer groups are taking aim at Aug. 20 recommendations by an Environment Ministry expert committee that some genetically modified organisms (GMO) be deregulated.

The expert committee proposed deregulation of organisms edited to remove or deactivate certain genes as opposed to adding new code, but critics are claiming this is “the same as genetic manipulation,” and that it is “strange” to exempt it from government restrictions.

“They (the committee) came to this conclusion after just two meetings. How can they say it’s safe?” said Consumers Union of Japan secretariat chief Michiyo Koketsu.

“We need a debate that includes a wide range of experts, not just a small section of the research community."

* * *

Consumers Union of Japan  http://www.nishoren.org/en/