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FEDERATION**
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**European Network of
Scientists
for Social and
Environmental
Responsibility**



**FIAN
INTERNATIONAL**

foodwatch



**Friends of the Earth
Europe**



GMWATCH

GREENPEACE

**IFOAM
ORGANICS EUROPE**

**LIVING SEEDS
INTERNATIONAL**



**Pesticide Action
Network
Europe**

**Slow Food®
Europe**

**SOS
save our seeds**

Mr Frans Timmermans
Executive Vice-President for the European Green Deal
European Commission

By electronic mail

16 May 2023

Re: Request for a meeting on New Genomic Techniques: Time to shift to evidence-based decision making for sustainable food systems and nature

Dear Executive Vice-President,

As Executive Vice-President for the European Green Deal we, the undersigned 300+ organisations, call on you to intervene and prevent the far-reaching deregulation of new genomic techniques at the expense of nature and the climate, and of farmers' and consumers' rights. We note with great concern that arguments in favour of deregulating new genomic techniques (NGTs) are often put forward without relevant evidence by DG Sante, especially when it comes to sustainability claims.

As you know, the EU already has legal clarity on the status of NGTs – according to the European Court of Justice, they are GMOs, based on Article 191.2 TFEU.¹ The EU also has effective GMO legislation, based on transparency, labelling, and safety checks, with an authorisation procedure that has proven its worth for more than 20 years. New GMOs are not banned in the EU. Just as with previous GMOs, any company can apply for a market authorisation for new GMOs.

¹ The ECJ decision C-528/16 was taken on the basis of both the existing GMO Directive and the precautionary principle. DG Sante's proposal to weaken existing requirements would fail to respect the precautionary principle. All GMOs, including new GMOs are classic examples of the need to apply the precautionary principle since they change DNA in a way that doesn't occur naturally. Consequently, the existing requirements of robust risk assessments, traceability and labelling must apply to all GMOs. Weakening these requirements would present a clear case of ignoring the precautionary principle and will likely lead to more lawsuits to reaffirm the precautionary principle as a pillar of EU policy.

DG SANTE justifies the planned far-reaching deregulation of new GMOs by claiming that they can contribute to achieving the Green Deal goals of sustainability and climate adaptation. Whether sustainable new GMOs will ever materialise is an open question, but up until now, not a single NGT exists that contributes to sustainability,² even in countries with far-reaching deregulation in force, like the USA and Canada. So if new allegedly sustainable GMOs are not being developed and brought to market quickly, the responsibility cannot lie with allegedly ‘overly strict’ regulation. And given the failure of new GMOs to deliver on sustainability, they will certainly not contribute to the Green Deal goals by 2030.³

Should the EU Commission follow DG SANTE’s deregulation proposal, there is an imminent risk of untested and unlabelled new GMOs entering the environment and the market, increasing pressure on biodiversity and undermining consumers’, farmers’ and business operators’ right to choose.⁴

Any deregulation of new GMOs would also threaten the Farm to Fork goal of a 50% reduction in pesticides by 2030. More than 20 years’ experience of commercial GMO cultivation in North and South America shows a dramatic increase in pesticide use, with negative impacts on human health and the environment.⁵ To delegate pesticide reduction to NGTs, as a few decision makers propose, is as false as it is irresponsible.⁶

If the Commission follows DG SANTE and removes traceability and labelling requirements for new GMOs, it would destroy the basis of GMO-free agriculture, which includes conventional, organic, and agroecological production systems. All non-GMO production systems depend on the knowledge of which plants have been produced through GM techniques. Full GMO transparency along the whole value chain is a necessary condition for the EU to achieve the Green Deal goal to expand organic farming to 25% of all EU arable land by 2030. Exempting new GMOs from safety testing, traceability and labelling requirements on one hand, and seeking to expand organic agriculture on the other hand, are mutually exclusive policy objectives. This obvious contradiction leads to the question of how the Commission would protect conventional, GMO-free and organic agriculture and food if it exempts NGTs from the existing rules.

² According to a [Joint Research Center study from April 2021](#), only 16 NGTs worldwide are at a pre-market stage. Our reading of the JRC paper is that none of these allegedly ready-to-market crops will mitigate biodiversity loss or the consequences of climate change.

³ See [Hüdig, M. et al. \(2022\) Genome Editing in Crop Plant Research—Alignment of Expectations and Current Developments](#) and [Wilson, A. \(2021\) Will gene-edited and other GM crops fail sustainable food systems?](#)

⁴ A [survey by the Rathenau Institute](#) found that participating Dutch citizens wanted regulation and labelling of new GMO products.

⁵ [Benbrook, C. \(2012\) Impacts of genetically engineered crops on pesticide use in the U.S. -- the first sixteen years](#)

⁶ [Foodwatch \(2023\) New Genomic Techniques \(NGT\): A Risky Corporate Distraction from Real Sustainable Solutions](#)

With a deregulation of certain new GMOs, as DG SANTE proposes, the Commission could do great damage without reaching any significant achievements in terms of sustainability. You would abolish safety and transparency standards for new GMOs at the expense of biodiversity, climate, consumers, and the majority of business operators in the farm and food sector. You would put at risk the largely GMO-free agriculture and food industry in the EU. You would also undermine the EU's aim to achieve 25% organic farming by 2030, as well as the aim to reduce pesticides. DG SANTE's approach is distracting political attention from real solutions on how the farming sector can reduce greenhouse gas emissions. High-tech plants will not slow down the deforestation fuelled by European demand for more animal feed – but organic and peasant farming already do.

We conclude that the best way is to maintain the current legal system for all generations of GMOs and keep new GMOs regulated under the existing EU rules including all labelling and traceability requirements. This will minimise potential negative impacts on nature, human and animal health and will uphold the precautionary principle and consumers and farmers' right to information as key political and social achievements of the EU.

We would like to request a meeting with you to hear your position and how you intend to uphold the integrity of EU law and the EU Green Deal in face of this attempt to undermine both of these. Given the interest in the subject of this letter, we will be sharing it publicly.

We look forward to hearing from you at your earliest convenience.

Yours sincerely,

Jorgo Riss
Executive Director, Greenpeace European Unit

Also on behalf of:

At the European or international level

Allianz ELIANT
BeeLife European Beekeeping Coordination
Biodynamic Federation Demeter International
Corporate Europe Observatory
Euro Coop
European Coordination Vía Campesina
European Network of Scientists for Social and Environmental Responsibility (ENSSER)
European Non-GMO Industry Association (ENGA) AISBL
FIAN International
Foodwatch International
Friends of the Earth Europe
GMWatch

IFOAM Organics Europe
Living Seeds International AG
Pesticide Action Network Europe
Save Our Seeds
WeMove Europe

At the national level

AbL e.V.
ACU - Associazione Consumatori Utenti (Consumers Users Association)
AEGIOPS
AG der NaturFreunde in Baden-Württemberg e. V.
AgrobioPérigord
Agroecology in Action
AGROLINK Association
Aktion Agrar
Aktionsbündnis gentechnikfreie Landwirtschaft Baden-Württemberg
AltragricolturaBio
Amigos de la Tierra
Anthesis SRL, organic seeds
apfel:gut e.V.
Aprókirályságért egyesület
Ararát Teremtésvédelmi Munkacsoport
Arbeitsgemeinschaft für die biologisch-dynamische Wirtschaftsweise Bozen - Trent VFG
Arche Noah
ARGE Gentechnik-frei
Arran de terra SCCL
Ars Sacra Alapítvány
Asociación Agro Cultura Con Respeto
Association Bio consom'acteurs
Association des Amis de la Génération Thunberg
Association of Feed Producer, Warehouse-Keepers and Trade Companies
Associazione Italiana Agricoltura Biologica
Associazione per l'agricoltura biodinamica
Associazione Rurale Italiana ARI
Attac Austria
Aurelia Stiftung
Autre Terre asbl
Baloldali Alternatíva Egyesület
Beklen a Nagykunsági Civil Társadalomért Alapítvány
Beregi Természet- és Környezetvédelmi Egyesület
Beretzk Péter Klub

Beretzk Péter Természetvédelmi és Kulturális Hagyományőrző Egyesület
Bernard Lignon
BeyondGM/A Bigger Conversation
Bezobaly z.ú.
Bihar Kis-sárréti Civilek Tárasága
BIO AUSTRIA
Biodynamic Association Demeter Denmark
Biodynamic Association Norway
Biodynamic Association of Sri Lanka
BioForum
Biokontroll Hungária Nonprofit Kft
Biokreis e.V.
Biokultúra Közép-Magyarországi Egyesület
Bioland e.V.
Biopark e.V.
Bodrog Egyesület
BOLW e. V.
Bond Beter Leefmilieu
Börzsöny- Ipoly-mente PTO
BUND
BUND Naturschutz in Bayern
Bundesverband Naturkost Naturwaren e.V.
Bündnis für eine enkeltaugliche Landwirtschaft (BEL) e.V.
Campo Aberto - associaçao de defesa do ambiente
Canopea asbl
Cense équi'voc asbl
Centro Internazionale Crocevia
CEPTA – Centrum pre trvaloudržateľné alternatívy
Civiltà Contadina ODV
Clean Air Action Group
CNCD-11.11.11
Collège des Producteurs - secteur bio
Confédération paysanne
Consommateurs pas cobayes !
Consumer Association the Quality of Life-EKPIZO
Coordinamento Zero Ogm
CSA-Netwerk Vlaanderen vzw
Csalán Egyesület
CSEMETE Association of Nature and Environmental Protection
Csermely Környezetvédelmi Egyesület

Cycle en Terre SCRL
De Bolster Organic Seeds BV
De Landgenoten
Degrowth Kassel
Demeter Czech&Slovakia
Demeter e.V.
Demeter France
Deutsche Umwelthilfe e.V. (DUH)
Deutscher Naturschutzring e.V.
DIRT Charity
Dreikönigsaktion der Katholischen Jungschar
Dreschflegel e.V.
Druživa, o.z.
Dunakanyar Környezetvédelmi Egyesület
Dunakanyar Kultúrtáj és Környezetvédelmi Egyesület
Earth Thrive
ECOCITY
Ecologistas en Acción
EcoOne Internazionale
EcoOne Magyarországi Munkacsoport
EcoS Consultancy
ECOVAST Magyarországi Falvak és Kisvárosok Műhelye Egyesület
ECOVIN Bundesverband Okologischer Weinbau e.V.
Eduarda Tavares
Ekologiska Lantbrukarna
EKOTREND Slovakia - Zväz ekologického poľnohospodárstva
ELTE Nature Conservation CLub
Eosta
Eosta, Resilience Hub
Erde & Saat
Erdei Kerekasztal Egyesület
Erdi Környezetvédő és Városszépítő Egyesület (ErdKöVE)
Erdő Ajéndéka Alapítvány - Gift of the Forest Foundation
ESVY ry, Etelä-Suomen luonnonmukaisen viljelyn yhdistys
EuroNatur
European Consumers APS
Fabriek Paysanne
Fairwatch
Fauna Alapítvány
Federación de Consumidores y Usuarios CECU

Fédération Nationale d'Agriculture Biologique
Fédération Nature & Progrès
Federazione Nazionale Pro Natura
FederBio
Felelős Gasztrohős Alapítvány / Heroes of Responsible Dining Foundation
Fenntartható Fejlődés Civil Szakkerekasztal
Fenntartható Térségért Alapítvány
Fenntarthatóság Felé Egyesület / Towards Sustainability Association
Ferto Tó Barátai Egyesület
Fertő tó Barátai Egyesület
FIAN Austria
FIAN Belgium
FIAN Germany
Foll'avoine
Fondazione Italiana per la Ricerca in Agricoltura Biologica e Biodinamica (FIRAB)
Fondazione Seminare il futuro
foodwatch Austria
FOPA ry, Finnish Organic Producers' Alliance
Fürbundet organisk biologisk, Odling FOBO
Forum Rolnictwa Ekologicznego im. M. Górnego
Forum Umwelt und Entwicklung
Foundation Demeter
Frie Bønder Levende Land, La Via Campesina, Denmark
Friends of the Earth (Cyprus)
Friends of the Earth Malta
Frøsamlerne
fruchtwechsel e.V.
Fundacja im. Stanisława Karłowskiego
Fundacja Różnorodności Biologicznej AgriNatura (AgriNatura Agrobiodiversity Foundation)
Fundacja Strefa Zieleni
Fundacja Wspierania Dziedzictwa Kulinarnego Monumenta Culinaria
Fundacja Zielone Światło
GAIA - Grupo de Acção e Intervenção Ambiental
Gaja Környezetvédelmi Egyesület
GATE Zöld Klub Egyesület
Gen-ethisches Netzwerk e.V.
Générations Futures
Giligán természetvédelmi és hagyományőrző egyesület
GLOBAL 2000
Global Organic Textile Standard

GM Freeze
Grøn Hverdag
Gyöngybagolyvédelmi Alapítvány
Hangya Egyesület
Harmónium Egyesület
Herman Ottó Természetvédő Kör
Hnuti DUHA - Friends of the Earth Czech Republic
HOLOCEN Természetvédelmi Egyesület
Hortiforum asbl
Humusz Szövetség/Humusz Waste Prevention Alliance
Hungarian Climate Alliance
IG Saatgut
Independent knowledge institute, Louis Bolk Institute
Instytut Spraw Obywatelskich (Civil Affairs Institute)
Interessengemeinschaft der Biomärkte e.V.
Irish Organic Association
ISDE Italy (International Society of Doctors for Environment)
Jordens Vänner Helsingborg
Junge AbL
Kalocsakörnyéki Környezetvédelmi Egyesület
Kaptárkő Egyesület
Kétker Community Foundation
Keyserlingk-Institut
Kiserdő Egyesület
Környezeti Tervezési és Nevelési Hálózat
Közép-Magyarországi Zöld Kör
Kultursaat e.V.
L'Aresta Cooperativa Agroecologica SCCL
La Ruche de l'Ecologie
Landesvereinigung für den ökologischen Landbau in Bayern e.V. (LVO)
Landsforeningen Praktisk Økologi / Danish Association for Practical Ecology
Le Chant des Arbres Jean Luc Petit
Le Début des Haricots ASBL
Lebende Samen e.V.
Les Amis de la Terre France
Lipu - BirdLife Italia
Litauischer Verband Biodinamika LT
Magosfa Alapítvány
Magyar Biokultúra Szövetség/Hungarian Biokultúra Federation
Magyar Környezetvédelmi Egyesület

Magyar Művelődési Társaság
Magyar Permakultura Egyesület/Hungarian Permaculture Association
Magyar Természetvédők Szövetsége / Friends of the Earth Hungary
Martfűi Városszépítő Egyesület
Matthias Maier Beutelsbacher Fruchtsaftkelterei gmbH
Merckens development support gmbh
Mezsgye Alapítvány
Miljøbevægelsen NOAH - FoE Denmark
Minnaar consultant
Mouvement d'Action Paysanne (MAP)
Mouvement de l'agriculture biodynamique (MABD)
Mouvement Ecologique
Mozgalom az Egészséges Város Környezetért Civil Társaság
NABU
Nagy Tavak és Vizes Előhelyek Szövetsége
Nagykovácsi Természet- és Környezetvédő Egyesület
NaNa BIO BV
Naphimnusz Teremtésvédelmi Egyesület/Canticle of Sun Association
Nature & Progrès Belgique
Naturefriends Greece
Naturland e.V.
Navdanya International
Navdanya International
NGO "Nimbus" Loznica
Nimfea Természetvédelmi Egyesület
Nők a Balatonért Egyesület
NOrdBruk
Nordic Maize breeding
Norwegian Farmers and Smallholders Union
Nyugat-Dunántúli Biokultúra Egyesület
Občianska iniciatíva Slovensko bez GMO
Občianske združenie Vidiecky parlament na Slovensku
Objectif Zéro OGM
OBV Via Campesina Österreich - Österreichische Berg- und Kleinbäuerinnen Vereinigung
OGM dangers
Okofilmklub Egyesület
OMNIA CONJUGO - INSTITUTO BIODINAMICO
Organic Aquaculture - Denmark
Organic Farmers & Growers CIC
Organic farmers Association of Ilia

OZ Spoločnosť pre trvalo-udržateľnú kultúru, Skola permakultúry
Palombar - Associação de Conservação da Natureza e do Património Rural
Pandal Egyesület
Pécsi Zöld Fiatalok Egyesülete
Peliti
Permakultura CS
Pesticides Action Network
Plataforma Transgénicos Fora
POLLINIS
Polska Izba Zywności Ekologicznej (Polish Chamber Organic Food)
Polski Klub Ekologiczny
Pomona vzw
probila-unitrab
Profilantrop Association
Quercus ANCN
Reflex Environmental Association
Réseaux Transition
Sambucus e.V.
Sciences Citoyennes
SEAE- Sociedad Española de Agricultura Ecológica y Agroecología
SEED
Seed vicious aps
Séta a Mecsekért Civil Osszefogás
SIA Sertifikācijas un testēšanas centrs
SITO seeds, Network for the protection of traditional seeds
Skydda Skogen
Slovenský zväz včelárov/ Slovak Beekeepers Association
Slow Food Deutschland
Slow Food Italy
Slow Food Nederland
Slow Food Pressburg
Slow Food Stockholm
Sophie Kraul
SOS Faim
Społeczny Instytut Ekologiczny (Social Ecological Institute)
Stichting Agro Eco
Stop Avalon Tata Civil Mozgalom
Stowarzyszenie Ekologiczne EKO-UNIA
Stowarzyszenie Polska Wolna od GMO
Stowarzyszenie Producentów Zywności Metodami Ekologicznymi Ekoland

Szerkő Környezeti Nevelési Egyesület
TAGWERK e.V.
Tanácsadók a Fenntartható Fejlődésért
tegut... gute Lebensmittel
Tegyünk Együtt Tudatosan Településünkért Egyesület - TETT
Természet és Környezetvédők Solti Egyesülete
Terra! - Aps
Terre d'Abeilles
Tisza Klub
Toekomstboeren
Tölgyi Természetvédelmi Egyesület
Udruga OPG-a Agricola
Union Nationale de l'Apiculture Française
Union Nationale des Agrobiologistes Belges (UNAB)
Uniterre
Városmajori Parkbarátok
Včelársky ekologický spolok Slovenska
Védegylet Association
Velt vzw
Verband Lebensmittel Ohne Gentechnik e.V. (VLOG)
Verbund Okohöfe e.V.
Verdi Ambiente e Società
Vereenigung fir Biolandwirtschaft Lëtzebuerg a.s.b.l.
Verein zur Erhaltung der Nutzpflanzenvielfalt e.V.
Vidiecka platforma
Vigilance OGM 46
Visnyeszéplaki Faluvédő és Közművelődési Egyesület
Vitale Rassen
Voedsel Anders
Vzw Climaxi
Werkgroep Natuurlijk Imkeren - WNI
Werkmaatschappij Agro Eco BV
Za Zemiata, FoE Bulgaria
Zachodniopomorski Oddział Stowarzyszenia Producentów Żywności Metodami Ekologicznymi Ekoland
Združenje Demeter Slovenija
Zelena akcija / Friends of the Earth Croatia
ZERO - assosciaçao sistema terrestre sustentável
Zerowasters
Zielone Wiadomości
Zöld Akció Egyesület (Green Action)

Zöld Akciócsoport Nyíregyháza

Zöld Kapcsolat Egyesület

ZOLD KOR

Zöld Zámor Természet és Környezetvédő Egyesület

Zöld-Híd Alapítvány

Zukunftsstiftung Landwirtschaft

Zveza biodinamikov Slovenije

Związek Zawodowy Rolników Ekologicznych św. Franciszka z Asyżu