

Please support a global moratorium on the environmental release of gene drive organisms

Dear Commissioner Sinkevičius,

Dear Commissioner Kyriakides,

We, the undersigned civil society organizations, write to you to request that the EU Commission fully supports the EU Parliament's call for **a global moratorium on the release of Gene Drive Organisms (GDOs)**. This is in view of the EU preparation for the upcoming Conference of the Parties (COP15) to the Convention on Biological Diversity (CBD) and the Cartagena Protocol on Biosafety (COP-MOP10). In its resolution of January 2020, the Parliament requests, "*the Commission and the Member States to call for a global moratorium at the COP15 on releases of gene drive organisms into nature, including field trials ...*".ⁱ

Gene Drive technology aims at the eradication of populations and even entire species by means of genetic engineeringⁱⁱ. Currently, reversal of its effects is not possible. The environmental release of Gene Drive Organisms poses serious and novel threats to biodiversity and the environment at an unprecedented scale and depth, since any Gene Drive Organism carries a serious risk of uncontrollable spread of genetically modified genes and genetic mechanisms into wild and domesticated populations. While the new Corona virus is a very different phenomenon, it stands as a stark warning for the need of precaution regarding the potential effects of the uncontrollable spread of a new organism.

Any environmental release of Gene Drive Organisms would violate the EU's GMO directive 2001/18/EC, which states: "*Member States shall, in accordance with the precautionary principle, ensure that all appropriate measures are taken to avoid adverse effects on human health and the environment which might arise from the deliberate release or the placing on the market of GMOs.*"ⁱⁱⁱ

The technology is incompatible with the Commission's proposed EU strategy on biodiversity protection according to which the EU supports a worldwide commitment for "*no human-induced extinction of species*".^{iv}

Furthermore, a report^v published by the environmental protection and nature conservation agencies of Austria, Germany, Italy, Finland, Lithuania, Malta and Switzerland highlights possible negative effects of Gene Drive Organisms for the environment and nature, including irreversible changes to food chains and ecosystems, and losses of biodiversity.

Also, the European Network of Scientists for Social and Environmental Responsibility (ENSSER), based on the findings of their report^{vi}, recommends that, in light of the unpredictabilities, the lack of knowledge and the potentially severe negative impacts on biodiversity and ecosystems, any releases (including experimental) of Gene Drive Organisms into the environment be placed on hold to allow proper investigation until there is sufficient knowledge and understanding.

Given the EU's GMO Directive, the EU's policy and strategy on biodiversity, the opinion of environmental agencies of EU Member States, scientific evidence and of course the Parliament's resolution, we urge you to take into account the need for **a global moratorium on any environmental release of Gene Drive Organisms.**

The undersigned organizations are of course ready to provide any additional information that you or your staff might need.

Yours sincerely,

On behalf of the undersigning organizations

Jorgo Riss
Greenpeace EU

Jagoda Munic
Friends of the Earth Europe

Benedikt Härlin
Save Our Seeds / Zukunftsstiftung Landwirtschaft

Attached:

Briefing: Why a global Gene Drive moratorium is necessary. By Save Our Seeds

Executive Summary of "Gene Drives: A report on their science, applications, social aspects, ethics and regulations." Published by the European Network of Scientists for Social and Environmental Responsibility (ENSSER), Critical Scientists Switzerland (CSS) and the Federation of German Scientists (VDW) in 2019.

Signatories



Compassion in World Farming	EU
Corporate Europe Observatory (CEO)	EU
Ecoropa	EU
European Coordination Via Campesina (ECVC)	EU
European Professional Beekeepers Association (EPBA)	EU
Friends of the Earth Europe	EU
Greenpeace EU	EU
IFOAM EU	EU
Pesticide Action Network Europe (PAN Europe)	EU
Slow Food Europe	EU
WeMoveEU	EU
Bioforum Vlaanderen	Belgium
CNCD 11.11.11	Belgium
FIAN Belgium	Belgium
IEW - Inter Environnement Wallonie	Belgium
Natagora	Belgium
Nature et Progrès Belgium	Belgium
UNAB - Union Nationale des Agrobiologistes Belges	Belgium
Vitale Rassen	Belgium
Za Zemiata – Friends of the Earth Bulgaria	Bulgaria
Eco Hvar	Croatia
NOAH – Friends of the Earth Denmark	Denmark
Apiservices - Beekeeping Development	France
CRIIGEN - Comité de Recherche et d'Information Indépendantes sur le Génie Génétique	France
France Nature Environnement	France
GIET - Groupe International d'Etudes Transdisciplinaires	France
OGM Dangers	France
Pollinis	France
AbL - Arbeitsgemeinschaft bäuerliche Landwirtschaft	Germany
Agrarkoordination	Germany
Aktion Agrar	Germany
Arbeitsgemeinschaft der Umweltbeauftragten der Gliedkirchen in der evangelischen Kirche Deutschland	Germany
bfub - Bundesverband der Umweltberatung	Germany
Bioland	Germany
BNN - Bundesverband Naturkost Naturwaren	Germany
Bodensee Stiftung	Germany
BUND – Friends of the Earth Germany	Germany
Dachverband Kulturpflanzen- und Nutztiervielfalt	Germany
DNR – Deutscher Naturschutzring	Germany
EuroNatur	Germany
FDCL - Forschungs- und Dokumentationszentrum Chile Lateinamerika e.V.	Germany
FIAN Deutschland	Germany
Forum Umwelt und Entwicklung	Germany
GeN - Gen ethisches Netzwerk	Germany
Germanwatch	Germany
GRÜNE LIGA Bundesverband	Germany
Heinrich Böll Stiftung	Germany
Katholische Landvolkbewegung Deutschland	Germany
Naturgarten	Germany
Naturland	Germany
oekom.e.V.	Germany
Oxfam Deutschland	Germany
Pro Wildlife	Germany
Schutzstation Wattenmeer	Germany

Schweisfurth Stiftung	Germany
Stiftung Gekko	Germany
Stiftung Grassroots	Germany
Umweltinstitut München	Germany
VEN - Verein für die Erhaltung der Nutzpflanzenvielfalt e.V.	Germany
Vereinigung der Freizeitreiter und -fahrer in Deutschland e.V. (VFD)	Germany
von Weizsäcker, Dr. Ernst Ulrich	Germany
Zukunftsstiftung Landwirtschaft in der GLS Treuhand	Germany
IG Saatgut	Germany
Testbiotech	Germany
Apicultural Research Educational Center	Greece
Instytut Spraw Obywatelskich / The Civil Affairs Institute	Poland
Jordens Vänner – Friends of the Earth Sweden	Sweden
Latinamerikagrupperna	Sweden
The Swallows India Bangladesh	Sweden
ETC Group	International
Global Nature Fund	International
Navdanya International	International
Four Paws	International
APIMONDIA Scientific Commission 'Bee Health'	International
APIMONDIA Scientific Commission 'Beekeeping for Rural Development'	International
APIMONDIA Scientific Commission 'Beekeeping Technology and Quality'	International
APIMONDIA Regional Commission for 'Americas'	International
EcoNexus	Science
Logos Environmental, Janet Cotter	Science

ⁱ In its resolution of January 2020, (2019/2824(RSP)) the European Parliament considers it important to "improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity" (para. C) and requests "the Commission and the Member States to call for a global moratorium at the COP15 on releases of gene drive organisms into nature, including field trials, in order to prevent these new technologies from being released prematurely and to uphold the precautionary principle, which is enshrined in the Treaty on the Functioning of the European Union as well as the CBD" (para.13). Online: https://www.europarl.europa.eu/doceo/document/TA-9-2020-0015_EN.html

ⁱⁱ Esvelt, K., et al. (2014). Concerning RNA-guided gene drives for the alteration of wild populations. *Elife* 17(3). // Rode, N., et al. (2019). Population management using gene drive: molecular design, models of spread dynamics and assessment of ecological risks. *Conservation Genetics* 20: 671-690. // National Academies of Sciences Engineering and Medicine (2016). *Gene Drives on the Horizon: Advancing Science, Navigating Uncertainty and Aligning Research with Public Values*. Washington DC, The National Academies Press

ⁱⁱⁱ Directive 2001/18/EC on the deliberate release into the environment of genetically modified organisms, Article 4, (1)

^{iv} Communication from the Commission to the European Parliament, the Council, the European Committee of the Regions. EU Biodiversity Strategy for 2030. Brussels, 20.5.2020 COM(2020)380. Online: https://eur-lex.europa.eu/resource.html?uri=cellar:a3c806a6-9ab3-11ea-9d2d-01aa75ed71a1.0001.02/DOC_1&format=PDF

^v Dolezel, M. et al. (2019): *Gene Drive Organisms. Implications for the Environment and Nature Conservation*. Umweltbundesamt, Vienna.

^{vi} CSS, ENSSER, VDW (2019). *Gene Drives. A report on their science, applications, social aspects, ethics and regulations*. Online: <https://genedrives.ch/wp-content/uploads/2019/10/Gene-Drives-Book-WEB.pdf>