



Bund für
Umwelt und
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Deutschland



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Biotechnology



Arbeitsgemeinschaft
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Joint statement to the Member States of the EU:

We need a robust and scientifically based regulation for NGT plants!

Dear ministers, experts and decision makers of the EU Member States,

we write to you in the context of the current discussions on new genomic techniques (NGTs) as applied on plants.

Currently, there are contradictory scientific positions about the specific risks of NGT plants and how they should be assessed.

Indeed, NGTs may be considered to be more targeted than the older methods of genetic engineering. It is also known that NGTs can generate traits and may go along with risks that go beyond what can be expected from conventional breeding. Furthermore, experts agree that the field of technology will evolve further.

Therefore, it is necessary to develop regulation that can be adapted case by case and allows risk managers to keep oversight and control in a rapidly expanding field. Unfortunately, the proposals that have been put forward by the Belgian Presidency, EU Commission and Parliament do not achieve this goal. They propose a new regulation that would not allow to

- examine risks in each case and step by step as needed for the protection of health and the environment;
- keep oversight and enable monitoring for all plants after being introduced into the environment and the market;

- separate cultivation and food production in a way that protect producers using traditional non-GE methods;
- trace, track and label the final products;
- maintain basic liability schemes for producers and growers of NGT.

Therefore, instead of adopting these proposals, we call upon the Member States to discuss the proposal made by the French competent authority ANSES.

ANSES (2024) proposes a decision tree that works within current GMO regulation and allows to adapt approval processes and monitoring to the evolving field of NGT plants.¹ According to this proposal, a step by step risk assessment can be used to actually speed up decision-making: It starts with the usual first steps of risk assessment, namely molecular characterisation and plant composition. At the same time, the decision tree may correspond to the Commission's goal to adapt the approval process for different levels of risks. Furthermore, the regulation would still allow the political decision-maker to oversee and monitor the scale of releases. In addition, transparency, coexistence and consumer choice would be upheld.

Dear ministers, experts and decision makers of the EU Member States, please help us to arrive at a robust and scientifically based legal GMO framework that can be adapted to the evolving field of NGT plants, based on the precautionary principle and open to future developments. In this regard, the proposal of ANSES (2024) follows the idea of the Commission and the Parliament without putting at risk the advantages of the current legal framework.

We call on you to reject any deregulation or rushed agreement and instead take the time to properly discuss the ANSES proposal. Please ensure that health and environment remain adequately protected and ensure transparency along the food chain enabling breeders, farmers and consumers to take informed choices.

Best regards,

Agrolink Association (Bulgaria)

Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL, Germany)

ARGE Gentechnikfrei

Aurelia Foundation (Germany)

Biodynamic Federation Demeter International e.V.

BUND (Friends of the Earth Germany)

Deutscher Berufs und Erwerbs Imker Bund e.V. (Germany)

Corporate Europe Observatory (CEO)

Earth Trek (Zemljane staze, Croatia)

European Non-GMO Industry Association (ENGA)

Plataforma Transgénicos Fora (Portugal)

Gen-ethisches Netzwerk e.V. (Germany)

IFOAM Organics Europe

Nature & Progrès Belgique (Belgium)

Save Our Seeds! (SOS)

Sito Seeds (Greece)

Testbiotech (Germany)

¹ANSES (2024) Risques et enjeux socio-économiques liés aux plantes NTG, figure 2, <https://www.anses.fr/fr/content/actu-nouvelles-techniques-genomiques>.