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Copied to: Commissioners Hogan, Kyriakides, Wojciechowski

Brussels, 17 March 2020

## **EU scrutiny of GM food is not negotiable**

Dear President von der Leyen,

Further to a broad civil society statement on the EU-US trade negotiations,<sup>1</sup> we would like to once again underline the need to maintain EU food safety standards.

According to media reports, the Commission would like to accelerate authorisations of genetically modified organisms (GMOs) as part of a trade deal with the US.<sup>2</sup>

Despite long years of aggressive marketing, GM technology has only been taken up by a handful of countries, for a handful of crops. In fact, the number of countries growing GM crops has been shrinking since 2010.<sup>3</sup> Today, almost 90 percent of global GM cropland is devoted to crops engineered to survive spraying with herbicides that would otherwise kill them.<sup>4</sup> Their cultivation has led to a massive increase in herbicide use.<sup>5</sup>

GM crops are predominantly grown as large-scale industrial monocultures, with damaging impacts on ecosystems. GM plants have also been found to cross into wild populations, with as yet unknown consequences. Potential risks to public health, which may arise from compositional differences compared to non-GM crops, remain poorly understood.<sup>6</sup>

The EU has introduced stringent rules to ensure that GMOs can only be marketed following a thorough safety assessment, and subject to traceability and labelling requirements. These standards are there for good reasons: to protect citizens and the environment.

## **The level of scrutiny of individual GMOs cannot be lowered**

Already today, EU GMO authorisations are based on a cursory scientific evaluation that ignores important pathways of potential harm. The assessments provided by the European Food Safety Authority (EFSA) usually ignore crucial aspects such as increased chemical use linked to herbicide tolerant GM crops, as well as potential adverse effects arising under stress conditions (such as drought) and over several generations. They also disregard effects that can arise when different GM traits are brought together in so-called “stacked events”.<sup>6</sup>

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<sup>1</sup> Seattle To Brussels Network, 11 February 2020, [Civil Society Statement EU-US Trade Talks](#)

<sup>2</sup> Politico Europe, 26 February 2020, [EU mulls faster genetically modified food approvals for Trump](#)

<sup>3</sup> [International Service for the Acquisition of Agri-biotech Applications \(ISAAA\)](#), 2010, 2012, 2018

<sup>4</sup> In 2018, 46% of the global GM crop area was covered by herbicide tolerant crops, and another 42% by crops that combined herbicide tolerance with insect resistance, according to [ISAAA](#).

<sup>5</sup> Greenpeace, November 2015, [Twenty Years of Failure](#)

<sup>6</sup> Research project [RAGES](#) (Risk Assessment of genetically engineered organisms in the EU and Switzerland)

In addition, EU GMO authorisations are the result of a deeply undemocratic decision-making process, in which the Commission decides unilaterally – without the backing of a qualified majority of EU member states and against parliamentary objections carried by a majority of MEPs.<sup>7</sup> This process undermines the EU's democratic credentials and further compromises the EU's health and environmental protections.

Speeding up this already unsatisfactory process would further reduce scientific rigour and democratic control. It may stop EFSA from requesting further data to ascertain the safety of GMO products. It may also leave insufficient time for EU governments and the European Parliament to conduct their examination and express their views.

### **Instead of accelerating GMO authorisations, the Commission should**

- **Properly implement the existing EU GMO legislation**

The safety assessment of GMOs should be improved so that they are only authorised “after a scientific evaluation of the highest possible standard ... of any risks which they present for human and animal health and ... for the environment”, as required by EU GMO legislation.<sup>8</sup>

The landmark ruling of the European Court of Justice of 25 July 2018 on the scope of EU GMO law should be fully applied.<sup>9</sup> Any attempts to exempt GMOs derived from new genetic engineering techniques such as CRISPR-Cas from EU GMO legislation should be rejected.

- **Tighten EU GMO legislation**

Existing gaps in the EU's labelling regulations for GMOs need to be closed to ensure that consumers have full information about GMOs used in food production. At present, food derived from animals raised on GM feed does not have to be labelled.<sup>10</sup>

Finally, there is an urgent need to reform the GMO authorisation process so as to enable full democratic control of EU authorisation decisions. Our organisations have already issued some recommendations in that regard.<sup>11</sup>

President von der Leyen, your Commission has announced a European Green Deal to better protect our environment and the global climate. We urge you to prevent any weakening of existing protections under the mum of lifting “regulatory barriers” to trade, which would undermine this objective.

Respectfully yours,

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<sup>77</sup> Greens/EFA, 10 October 2019, [New Parliament reasserts its opposition to GMOs](#)

<sup>8</sup> [Regulation \(EC\) No 1829/2003](#) of the European Parliament and of the Council of 22 September 2003 on genetically modified food and feed

<sup>9</sup> European Court of Justice, 25 July 2018, [Judgment in case C-528/16](#)

<sup>10</sup> [Regulation \(EC\) No 1830/2003](#) of the European Parliament and of the Council of 22 September 2003 concerning the traceability and labelling of genetically modified organisms

<sup>11</sup> Friends of the Earth Europe, Greenpeace, HEAL, IFOAM EU and Pesticide Action Network Europe, 13 February 2017, [Joint letter on changes to EU decision-making concerning health, agriculture and food](#)