

Phil Hogan
Commissioner for Trade
European Commission
200 Rue de la Loi
1049 Brussels

Copied to: Commissioners Kyriakides, Wojciechowski

Brussels, 5 May 2020

Re. EU scrutiny of GM food is not negotiable

Dear Commissioner Hogan,

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

According to media reports, the Commission is still in negotiation with the United States, despite the Covid-19 pandemic, and would like to “intensify” the work on regulatory cooperation.² As part of these talks, the Commission may offer to accelerate authorisations of genetically modified organisms (GMOs).³

The EU GMO regime aims to protect people and the environment.

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 2010.⁴ Today, almost 90 percent of global GM cropland is devoted to crops engineered to survive spraying with herbicides that would otherwise kill them.⁵ Their cultivation has led to a massive increase in herbicide use.⁶

GMOs are predominantly grown as large-scale industrial monocultures, with damaging impacts on ecosystems. They have 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.⁶

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 people 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”.⁷

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

¹ Seattle To Brussels Network, 20 February 2020, [Civil Society Statement EU-US Trade Talks](#)

² Politico Europe, 2 April 2020, [EU aims to 'intensify' negotiations with US to fight coronavirus](#)

³ Politico Europe, 26 February 2020, [EU mulls faster genetically modified food approvals for Trump](#)

⁴ International Service for the Acquisition of Agri-biotech Applications (ISAAA), 2010, 2012, 2018

⁵ 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.

⁶ Greenpeace, November 2015, [Twenty Years of Failure](#)

⁷ Research project [RAGES](#) (Risk Assessment of genetically engineered organisms in the EU and Switzerland)

member states and against parliamentary objections carried by a majority of MEPs.⁸ 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 GM 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.⁹

The landmark ruling of the European Court of Justice of 25 July 2018 on the scope of EU GMO law should be fully applied.¹⁰ 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 should 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.¹¹

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.¹²

Commissioner Hogan, the new Commission, that you are a member of, has announced a European Green Deal to better protect our environment and the global climate. We ask you do all you can, in your capacity as Trade Commissioner, to achieve this objective and to prevent any weakening of existing protections under the mum of lifting “regulatory barriers” to trade.

Respectfully yours,

Jagoda Munic, director Friends of the Earth Europe.



⁸ Greens/EFA, 10 October 2019, [New Parliament reasserts its opposition to GMOs](#)

⁹ [Regulation \(EC\) No 1829/2003](#) of the European Parliament and of the Council of 22 September 2003 on genetically modified food and feed

¹⁰ European Court of Justice, 25 July 2018, [Judgment in case C-528/16](#)

¹¹ [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

¹² 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](#)

Supported by

EcoNexus	Europe
AEFJN	Europe
Food & Water Action Europe	Europe
ÖBV-Via Campesina Austria	Austria
Attac Austria	Austria
Anders Handeln	Austria
D19-20	Belgium
vzw Climaxi	Belgium
V-SB	Belgium Flanders
Nature & Progrès Belgique	Belgium
Za Zemiata, FoE Bulgaria	Bulgaria
FoE Cyprus	Cyprus
Zelena akcija / FoE Croatia	Croatia
NOAH - FoE Denmark	Denmark
OGM dangers	France
Attac France	France
Aitec	France
Collectif Stop TAFTA/CETA	France
Amis de la Terre	France
Veblen Institute	France
Amis de la terre - Pays viganais	France
Collectif Causse Méjean - Gaz de Schiste NON !	France
Eskani SIRUGUET	France
Gen-ethisches Netzwerk e.V.	Germany
Save Our Seeds	Germany
Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL) e.V.	Germany
LobbyControl	Germany
Forum Umwelt & Entwicklung	Germany

Umweltinstitut München e.V.	Germany
Slow Food Deutschland	Germany
Védegylet Egyesület	Hungary
Magyar Természetvédők Szövetsége - FoE Hungary	Hungary
Magyarországi Éghajlatvédelmi Szövetség - Climate Alliance Hungary	Hungary
Reflex Környezetvédő Egyesület	Hungary
Egyesült Villamosenergia-ipari Dolgozók Szakszervezeti Szövetsége (EVDSZ)	Hungary
Humusz Szövetség (HUMUSZ Waste Prevention Alliance)	Hungary
Nők a Balatonért Egyesület	Hungary
Clean Air Action Group	Hungary
ELTE Nature Conservation Club	Hungary
Magosfa Alapítvány (Magosfa Foundation for Environmental Education and Eco-tourism)	Hungary
CEEweb for Biodiversity	Hungary
Zöld Akció Egyesület (Green Action)	Hungary
Heroes of Responsible Dining Foundation (Felelős Gasztrohős Alapítvány)	Hungary
MAPER, Magyar Permakultúra Egyesület, Hungarian Permaculture Association	Hungary
ZÖLD KÖR	Hungary
Cargonomia	Hungary
Természet	Hungary
Fauna Alapítvány	Hungary
KEEP IRELAND FRACKING FREE	Ireland
FÍS NUA	Ireland
Climate Change Ireland	Ireland
Stop TTIP Italia	Italy
Fairwatch	Italy
Water Grabbing Observatory	Italy
Gas Radici	Italia
MAG4 Piemonte	Italy
Dimensioni Diverse	Italy

Casapace Milano	Italy
Slow Food Italia	Italy
Stop TTIP Udine	Italy
Terra!	Italy
Gas del Parco	Italy
Mouvement Ecologique	Luxembourg
TROCA- Plataforma por um Comércio Internacional Justo	Portugal
BioPorto	Portugal
GMWatch	UK