



February 10, 2017

To the College of EU Commissioners  
BY EMAIL

**Re: Concerns about the Comitology Reform and Innovation**

Dear President Juncker,  
Dear First Vice-President Timmermans,  
Dear Vice-Presidents and Commissioners,

We are writing to you to express our concern about European Commission plans to launch a legislative proposal to change the so-called Comitology Regulation. As you know, this procedure is used for the approval of new biotech products in the European Union (EU) and we would encourage you to ensure that any modifications would not lead to additional delays and unpredictability in the approval process.

Unfortunately, the European Commission has so far failed to comply with its own standards of, and commitments to, transparency by indicating that it will publish these proposals on February 14, 2017 without any prior consultation of interested parties on the nature of its planned modifications.

Our grower organizations as well as European industry groups have repeatedly complained to the European Commission and to Member States about the slow implementation of the approval process. The unnecessary delays of these authorizations over the years have caused serious uncertainty, disruption and cost to farmers and others in the agricultural supply chain on both sides of the Atlantic. We are concerned that any changes to the comitology procedure would lead to additional uncertainties in decision-making which would risk further delays and the potential for trade disruption.

The delays of the biotech approvals in the existing system have been the result of the increasingly slow assessments by the European Food Safety Authority (EFSA), by the opposition to approvals by certain Member States and by the unnecessary delays in the Commission's handling of the dossiers (as documented by the European Ombudsman, see [European Ombudsman report](#)).

It is regrettable that many Member States oppose EFSA's scientific opinions on political grounds. The current procedure rightly provides the European Commission with the authority to approve new products that have a positive scientific assessment. The basic principle of science-based decision-making should be respected in any changes to the comitology procedure.

Predictability of authorizations of agricultural biotechnology crop products is crucially important for seed companies and farmers, as well as for the European livestock, poultry and feed industries, which are more than 70 percent dependent on imports of vegetable protein. We urge you to do everything in your power to speed up the authorization of new biotech products.

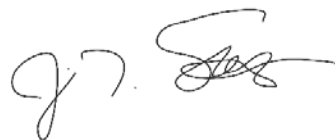
Finally, we ask that the EU comply with the legal timelines for biotech approvals as laid out in EU regulations and to respect the EU's obligations under World Trade Organization (WTO) rules.

We welcome the opportunity to discuss this matter further. Thank you.

Sincerely,



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