Mr First Vice-President of the European Commission,

The European Commission must not go ahead with the deregulation proposal relating to new genomics techniques. **The European Commission must maintain EU GMO rules for all GMOs - including those derived from new techniques** - in line with the CJEU’s opinion and the Green Deal Agreement. NGTs are to be regulated, not exempted from regulation.

**We demand that the environmental and health risk assessment be maintained, strengthened and conducted by an independent laboratory, as they must be greatly strengthened as scientific discoveries are made.** The European Commission’s position is to ignore all these risks, and exonerate Category 1 plants and some Category 2 GMOs from any assessment and evaluation of their risks to the environment. This categorization is arbitrary; no evidence is required to show that the GMO could have been produced with conventional breeding. The subject is emerging and there are still very few independent studies, but research has shown that environmental risks exist (including for example unintended on-site/off-site effects, environmental fate, contamination of wild species, and unpredicted adaptation of ecosystems). These risks must be explored by independent research, and strongly assessed before any release of these new GMOs, in accordance with the precautionary principle. For an effective protection, each GM plant must be assessed individually, no matter how small the intended change.

Moreover, **the full spectrum of unanticipated changes, identified through appropriate screening methods (long-read whole genome sequencing) should be considered.** The Commission’s proposal does not take into account unintended changes, while unforeseen genetic changes (both on and off target) may occur as a result of multi-step NGT processes. These changes are distinct from random mutations or conventional reproduction and may present new hazards. Cumulative effects, whether additive, antagonistic or synergistic, are particularly important to consider. Although individual traits are considered safe, uncertainties arise when these traits are combined. This means that environmental risk assessments of individual traits may not accurately predict long-term cumulative effects or interactions with the receiving environment, including combinations of multiple traits.

In addition to risk assessment, **we request that a TA be also required to avoid tipping points and irreversible damage to ecosystems.** Indeed, the introduction of genetically modified organisms into natural populations can have serious impacts on animal, plant and human health, which harms biodiversity and global well-being. Potential releases of transgenic GMOs present new dangers that can overwhelm the adaptability of ecosystems. GMO-LNG applications, as well as anthropogenic factors such as climate change, can destabilize ecosystems and intensify adverse effects.
Finally, the Commission’s proposal would further endanger pollinators, biodiversity and the environment, undermine the efforts of the organic sector to promote resilience and ecosystem-friendly agriculture, and break the principle of freedom of choice for producers and consumers to grow/consume without GMOs.

Intensive agriculture based on GMOs and organic farming without GMOs can not coexist, since the former would irremediably contaminate the latter, without the latter being able to prevent it. The scientific community has extensively studied and demonstrated gene flow phenomena, in which organisms within an ecosystem transmit certain genes to each other, including genes modified in the laboratory. Through this phenomenon, non-GM plants can carry modified genes. GMOs would then become uncontrollable and invisible. All organic crops could be progressively contaminated by genetic inputs.

Mr First Vice-President of the European Commission, using new gene editing technologies and GM organisms would jeopardize all efforts made to protect the environment, stop biodiversity loss and provide more secured food for the population. Voting for this proposal would mean the end of freedom of choice for producers and consumers and the end of organic agriculture respectful of pollinators, in favor of agriculture based on genetic inputs with uncertain risks, not respectful of human and animal health.

For all these reasons, the Commission must not go ahead with this proposal. New GMOs must be regulated on the same basis as pre-existing GMOs.

Sincerely,

Léa Volat
Chargée de mission affaires publiques

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