

Urgent demand from the Dutch Federation of Agro-ecological Farmers - keep our fields free from GMO's!

Dear Member of the European Parliament,

When voting on the NGT file on Wednesday 7 February, it is of utmost importance that you stand up for the protection of [consumers' and farmers' rights](#) and the environment. The current proposal is not based on science, as it scraps safety rules for the overwhelming majority of NGT crops without any scientific ground. Risks of harm to health and the environment will be externalised to society, while farmers' dependence on just a few seed firms will increase. We urge you to counter the major flaws of the report, and vote in favour of amendments bringing in:

- Safety checks for NGT crops
- Traceability to allow the GM-free food sector to be able to stay GM-free
- Co-existence and liability rules to protect the non-GM sector from unwanted contamination
- Labelling to allow consumers and farmers to make their own choice on whether to buy or use GMOs or not.

If these minimum demands are not met after voting on the NGT report, we urge you to reject it in the final vote.

Proposed deregulation not science-based; method to define 'Category 1' is not validated.

The claim that the new genetic engineering techniques are just as safe as conventional plants was rejected by the [French authority ANSES](#), which described the definition of the Category 1 NGTs (those that would be exempted from safety checks, full traceability, and consumer labelling), as proposed by the Commission, as arbitrary. 94% of NGTs currently in the pipeline would fall into this category, according to an analysis by the German Federal Agency for Nature Protection (BfN). [Another scientist statement](#) also favours a mandatory risk assessment of all genetically modified plants, as unexpected effects can occur that could harm health or the environment, and these should be ruled out before release.

However, the report by rapporteur Polfjard *expands Category 1* to an extent that is even more absurd. Only NGT plants that produce new, 'chimeric' or altered proteins would be subjected to mandatory risk assessment. However, there are many examples of NGT plants that pose risks to environment and health, even though no new proteins are formed.

This will erase consumer choice and farmers' and breeders' rights, as well as [increasing risks for biodiversity](#).

Health impacts and environmental damage: the risks are real!

According to the current report, NGT plants with completely new properties could be released into the environment and the food chain without undergoing risk assessment. Even trees and shrubs, grasses and other wild plants would be affected, as the proposal for deregulation is not limited to arable plants.

Unwanted by citizens

Scrapping all safety and transparency rules on NGTs goes **against public opinion**. Recent studies carried out in [Germany](#), by the [Federal Institute for Risk Assessment](#), in the [Netherlands](#) by the [Rathenau Instituut](#), [Sweden](#), [Austria](#) or [France](#) confirm this. Citizens

expressed that they want freedom of choice and high safety standards for the new techniques as much as for the old ones. Even citizens who are willing to consume gene edited food said they want the final product to be labelled so that they can choose. As food is a highly sensitive topic for most people, the highest level of transparency is indispensable.

Labelling requirements are not dependent on detection methods as show many mandatory labelling schemes in the EU, for example origin labelling or labelling based on production methods (eggs). More than 420,000 citizens signed an [EU-wide petition](#) calling to maintain risk assessment, traceability and labelling for all NGTs. Excluding new GMOs from [EU-wide labelling](#) rules, as the draft law says, conflicts with [EU treaties](#) and EU's general food law (Art 8,1).

Protect non-GM, organic food sector

The ban of all NGTs in organic production must be maintained and accompanied by traceability measures along the whole supply chain. Member States should adopt co-existence measures for NGT crops.

More in general, the NGT law could violate the individual rights of farmers, in particular their [fundamental rights to property and the freedom to run a business](#). It does not provide sufficient protection against the contamination of crops with new GMOs. Therefore, labelling and traceability are crucial, because they allow the identification of GMOs throughout the supply chain and make it possible to intervene in the case of health or environmental problems.

Patent issue cannot be solved in the NGT Regulation

Conventional and organic breeders are [very innovative](#) but will be hindered in their work by the patents already granted on new genomic techniques and their products. Farmers will become increasingly dependent on just a few seed firms, and risk getting sued in case of contamination, due to patents.

If there is no obligation to publish the identification methods for NGTs, then the [farmer has not way to prove](#) that they didn't use a patented invention in case they are sued for infringement. In this way, the scope of the patent can get extended to genetic information contained in conventional seeds. Farmers will be at risk to see their seeds, including peasants' seeds, privatised by seed multinationals. Breeders [are already receiving letters](#) from big GMO seed firms threatening legal action if they (even unknowingly) infringe their patents and this behaviour will increase in a deregulated scenario.

The NGT report provides a good suggestion to ban patents on NGTs, but this is not enough. This would require a change of the European Patent Convention (EPC), agreed by all of the Convention's 39 member states, which would take many years (if realised at all). The European Patent Office in Munich confirmed a few months ago that new genetic engineering will be treated as genetically modified organisms and are therefore [not excluded from patentability](#).

Claims of benefits unproven

The claim that new genetically engineered plants are the solution to climate change is completely unfounded. For [climate-resilient agriculture](#) and the [reduction of pesticides](#), we

need diversity in crops, varieties and cultivation systems adapted to local situations. Even in regions where NGTs have been deregulated for years, like the US, very few have reached the market. Those that have reached the market have not delivered on their sustainability promises. What is more, many new GM plants in the pipeline are not engineered for sustainability purposes, but to enhance their market value for the agribusiness, for example with an improved appearance. There are even examples of new GMOs failing on the market, like the Calyxt gene-edited soybean.

What is the better option?

Currently, NGT crops are covered by the existing EU GMO legislation. **The best solution is to keep it that way:** Europe's farmers' ability to preserve GMO-free production is an important competitive advantage for both the organic sector and the conventional sector. Liability rules in the event of damage must also be in place.

Therefore, we urge you to reject the EU Commission's legislative proposal!

Society or farmers must not be burdened with the consequential costs of damage caused by genetic engineering. Instead, these must be borne by those who wish to introduce NGT crops on the market. In all economic sectors, there are rules before a new product comes onto the market. This also applies to NGT crops, and the rules already exist in the existing EU GMO legislation.

Our group of concerned farmers and our societal partners will contact you again before the vote to provide you with voting recommendations.

Kind regards,



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