



Brussels, 4 September 2023

For the attention of:

The European Ministers of Agriculture

The Spanish Presidency of the Council of the European Union

Open letter: Supporting the deregulation of new GMOs amounts to destroying GMO-free agriculture, to the benefit of multinational seed companies and to the detriment of consumers' right to choose their food

European Coordination Via Campesina (ECVC) is a confederation of 31 European trade unions and organisations representing small- and medium-scale farmers and agricultural workers. Our organisations express their dismay at the drift taken by the current Spanish Presidency around the “new genomic techniques” (NTG), i.e. new genetic modification techniques (new GMOs). The announcement of the Spanish Presidency made it clear that its priority during these months is to work on the new legislative framework for new GMOs, with a view to secure a swift agreement on this proposal by the Council before December. Thus, a mechanism to promote new GMOs has been put in place, by a presidency which, we must remember, is required to play a neutral ombudsman role.

On the occasion of the informal Council of Ministers in Cordoba, our organisation wishes to respond to the document recently published by the Spanish Presidency “*New technologies for a more sustainable and resilient agriculture*”, which promotes a series of misleading arguments in favour of these new techniques. ECVC also aims to alert the entire Council of Ministers of the risks of deregulation of these new techniques for the whole European agricultural sector.

These new genetically modified organisms are being promoted as a means of achieving the sustainability and climate change adaptation objectives of the European Green Deal and the Farm to Fork Strategy. However, there are currently no genetically modified seeds on the market that reduce the use of pesticides or are drought resistant. Around the world, only 16 new GMOs are in pre-marketing, and few of the crops in the early stages of research and development have characteristics of climate resilience, as the sustainability of a seed is not an isolated feature but rather depends on the sustainability of the crop system in which it is planted. Given the failure of new GMOs in terms of sustainability, they will certainly not contribute to achieving the 2030 Green Deal targets. This new legislative framework would also threaten the Farm to Fork Strategy goal to reduce pesticide use by 50 per cent by 2030. The experience of more than 20 years of commercial cultivation of GMOs in North America, South America and Spain shows an alarming increase in pesticide use, with negative impacts on human health and the environment. Delegating pesticide reduction to NGTs will be as ineffective as it is irresponsible.

By promoting the so-called sustainability benefits of these new GMOs, many of the implications and issues we must consider have been overshadowed. This is the case with the issue of patents. All new GMOs are indeed patentable, and this is the main concern of the agricultural and seed sector¹ if the traceability of new GMOs is no longer guaranteed, as is the case with the proposal of the European Commission. As European patent law currently stands, only the traceability obligation prevents patents relating to patented GMOs from extending to seeds obtained through conventional breeding processes². Any loss of traceability of new GMOs will result in the privatisation of all seeds, including conventional seeds, through the patent model. This would be a clear violation of farmers' rights to seeds, recognised in Article 9 of the International

¹ECVC (2023), [Analysis: European Commission proposal on new GMOs, towards the appropriation of all seeds by the patents of a few multinationals.](#)

²ECVC (2022). [Impact of the Commission's initiative to amend GMO rules on the application of European patent law .](#)

Treaty on Plant Genetic Resources for Agriculture and Food (TIRPAA), as well as in Article 19 of the United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas (UNDROP).

The implications of eliminating traceability and labelling requirements for new GMOs are also overlooked in this debate. Yet, this would destroy the basis of guaranteed GMO-free agriculture, which includes conventional, ecological and agroecological production systems. We recall that full transparency of GMOs along the value chain is a necessary condition for the EU to achieve the Green Deal objective of extending organic farming to 25 % of all arable land in the EU by 2030. Exempting new GMOs from safety testing and traceability and labelling requirements, on the one hand, and attempting to expand organic farming on the other, are mutually exclusive policy objectives. This deregulation of new GMOs proposed by the Commission would not only violate the precautionary principle, but could cause considerable harm to the agricultural economy without achieving significant sustainability outcomes. It would remove the safety and transparency rules applicable to new GMOs to the detriment of biodiversity, climate, consumers and most operators in the agricultural and food sector. This would jeopardise not only agriculture, but also European small and medium-sized seed companies and EU food processors and distribution operators, largely guaranteed without GMOs, making a multi-billion-euro market.

The evidence that this debate is of great concern is that not all EU Member States are in favour of this deregulation. Many are aware of the implications outlined above, as well as the risks of losing seed sovereignty and increasing their dependence on the global seed market. Said market is monopolised by six companies: Bayer, Corteva, ChemChina/Syngenta, BASF, Limagrain and KWS8. These companies control 60 per cent of the market with their patents. If new GMOs were deregulated, this concentration would increase due to the business model of patents. This concentration and standardisation of marketed seeds will also lead to an irreversible loss of agrobiodiversity. As a result, seed varieties will be less resistant to climate change, because these resistant varieties are selected and developed locally by farmers and small seed producers, and these are threatened by this legislative proposal.

ECVC calls on the Spanish Presidency and the entire Council of Agriculture Ministers to take into account the legitimate concerns and economic interests of farmers in future discussions. The deregulation proposed by the Commission would have a disastrous impact on the entire European agricultural sector, the vast majority of which, i.e. 17 Member States, is fully or partially GMO-free.

ECVC also invites all European agriculture ministers to reject this proposal, which would be particularly detrimental to farmers who already implement sustainable agriculture on a daily basis and guarantee European food security, i.e. small-scale farmers practising agroecology and organic farming. As farmers, we do not want nor need patented GMOs to produce quality food in sufficient quantities and respects ecosystems and agrobiodiversity.

On behalf of the ECVC Coordination Committee,

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