

ECONEXUS



26 January 2015

Mr Vytenis Andriukaitis
Commissioner for Health & Food Safety
European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels

Open letter to the Commission on new genetic engineering methods

Dear Commissioner Andriukaitis,

In the interest of protecting the environment and public health, genetically modified crops are subject to risk assessment, an authorisation process and labelling rules under EU law. All non-traditional breeding processes that change the structure of DNA using genetic engineering technologies or interfere with gene regulation fall within the scope of these GM regulations. Some are now calling on the European Commission to exempt new genetic engineering techniques from GM rules. The undersigned groups argue that such an exception could threaten the environment and our health, and would violate EU law.

Any attempt to engineer genomes by invasive methods can cause unexpected and unpredictable effects. For example, “cisgenesis” - a genetic engineering technique that uses genes from the same species - is still genetic engineering and is therefore subject to unexpected and unpredictable effects caused by the genetic engineering process itself, and not by the trait or sequence inserted. New techniques to genetically engineer plants and animals, such as so-called DNA scissors (nucleases) and interventions in gene regulation, raise additional concerns.

Most of these techniques are so new that there is not sufficient information to properly assess the risks. Some also allow more radical changes to plant genomes than genetic engineering methods currently used in commercialised products.

We call on the Commission to reject any attempt to exclude these new techniques from EU regulation.

EU laws on genetic engineering should continue to be based on the precautionary principle, transparency and traceability. These same principles must apply to all new genetic engineering techniques and applications.

In particular, we urge the Commission to ensure that:

- Organisms produced by these new techniques will be regulated as genetically modified organisms under existing EU regulations (Directive 2001/18). This means that they will require a full risk assessment before any approval or authorisation is given.
- Any food, feed and seeds as well as other breeding material produced using such new techniques will be labelled and fully traceable throughout the food and feed supply chain.
- Nothing in the TTIP and CETA negotiations will limit Europe's sovereignty and ability to regulate new genetic engineering methods and products as GMOs.
- Current GM health and environmental safety testing requirements are strengthened in light of the enhanced ability of these new techniques - individually or in combination - to alter the genetic code of plants, animals and other organisms.

We would be very happy to elaborate on our concerns in a face-to face meeting and await your response.

Yours sincerely,

Francesco Panella, President, Bee-life European Beekeeping Coordination
Nina Holland, Researcher, Corporate Europe Observatory
Dr. Ricarda Steinbrecher, Co-Director, Econexus, UK
Andrea Ferrante, Coordinating Committee, European Coordination Via Campesina
Mute Schimpf, Food Campaigner, Friends of the Earth Europe
Dr Helen Wallace, Director, GeneWatch, UK,
Saskia Richartz, Acting Director, Greenpeace European Unit
Christoph Then, Executive Director, Testbiotech, Germany