



ARCHE NOAH

To the

Members of the European Parliament

Vote on Paulsen report on plant breeding (2012/2099(INI)) 25 February 2014

Dear Member of the European Parliament,

you and your colleagues are going to vote on the report on plant breeding: "what options to increase quality and yields?" (2012/2099(INI)), drafted by MEP Marit Paulsenⁱ, in the plenary on 25 February 2014.

The signatories of this letter, who represent consumer co-operatives, organic farmers, food processors and retailers, organic plant breeders, environmental organisations and citizens engaged in initiatives for the preservation of farm genetic resources, call on you to

Reject the Paulsen report's attempt to introduce GMOs in Europe through the back door.

The **Paulsen initiative report** represents another hidden attempt to introduce in Europe genetically modified (GM) crops and high tech solutions that benefit a handful of industries instead of society as a whole.

The real intentions of the report are rather hidden in the text behind colourful arguments about biodiversity and food security. However, its intentions are already reflected in the references, highlighting EU legislation that regulates GMOs and a Swedish report on the positive potential of GMO crops.

The Paulsen report provides a **false picture of the challenges our food and agricultural system faces** by using contested and outdated figures, just to make the case for the introduction of GM crops in the European territory. The author claims that Europe needs to further intensify and industrialise its agriculture in order to feed the world. However, such an argument lacks any scientifically sound justification and it promotes an ill-conceived 'productivity' narrative (SCAR 2011)ⁱⁱ. Moreover, other regions of the world have the potential to feed themselves - the adoption of very elementary agronomic practices, simple technologies, better education for farmers, access to land and basic infrastructures can double food production in many poor regions of the world in just few years, if politically and financially supported.

The Paulsen report mentions the IAASTDⁱⁱⁱ report. However, such reference is based on a misunderstanding, as exactly this UN global assessment of agricultural science and technology for development led to the conclusion that **investments in farmers' knowledge and agro-ecological systems are highly needed** and warns that plant breeding companies are nowadays more focused on their intellectual property rights than on useful innovation^{iv}.

The report ignores the **consistent opposition of EU citizens and their governments to GMOs** in agricultural uses, as evidenced in all the Eurobarometer studies conducted on the issue in the last two decades. With the upcoming European Elections you have the duty to demonstrate EU citizens that the European Parliament is taking very seriously into account their opposition to GM crops.

Preserving and making use of all the existing plant genetic resources plays a substantial role to ensure farming systems are resilient and sustainable. No doubt- society needs to also invest in plant breeding as well as in the development of practices and technologies to improve food quality, increase yields and reduce post harvest losses. *But* these **investments must target knowledge and technologies that deliver true and long term benefits** for the society, the environment and food security. The potentials of knowledge based solutions as well as classic breeding are far from being exploited yet: We need to better understand ecological systems, use the potential of plant genetic resources, invent more on efficient crop rotations and mixed cropping as well as improve methods of biological plant protection.

The undersigned organisations urge you to reject this latest attempt to promote GM crops and other technological fixes which cannot solve the serious and complex problems food and agriculture systems are facing but are actually part of the problems themselves.

Given the fundamental flaws affecting this own initiative report and the lack of urgency to adopt such a text, we call on you to **reject the Paulsen report**.

Yours sincerely



Marco Schlüter, Director IFOAM EU

on behalf of Arche Noah, Corporate Europe Observatory, EuroCoop, Greenpeace EU Unit, IFOAM EU

Our voting recommendations in more detail (points concerning GMOs are highlighted, other points added):

Text part in Paulsen report	Vote	Justification
Recital F, part 2: "inter alia out of a concern to preserve biodiversity"	-	Separating the land in "production" and "conservation" zones is a wrong approach, as it denies the interactions between farm land and zones left to natural vegetation (e.g. pesticide drift as negative impact on natural vegetation; but also the function of natural habitats for beneficial insects, etc.).

Text part in Paulsen report	Vote	Justification
Recital K , part 2: "and a need for new farming techniques"	-	New farming "techniques" suggests that pure technology based approaches would be needed. This is not the case: the complexity of agro-ecological systems needs to be addressed. We need investment in knowledge and system based approaches towards better farming of the future.
Recital L , part 2: "whereas the crops seen in the fields today cannot remain the same in the future if we are to meet the increased need for food;"	-	It is a myth that we would now need a breakthrough in inventing completely new crops. The necessary genetic material, bearing resiliencies to crop diseases, exists, it just needs to be used, screened for the characteristics and re-combined by classic breeding and efforts to involve farmers in breeding (participatory breeding), GM and similar technologies are not needed in plant breeding.
Recital M	-	This is an attempt to lengthen the period of variety protection. The possible term of protection runs now 20 years from the certificate's date of issue, or 25 years in the case of a tree or vine. An extension would lengthen the period for when the variety enters into the public domain and would stifle innovation.
Article 6	-	Also in case of minor uses, human and environmental safety criteria must be considered. Investments in alternatives on the basis of a strict application of the integrated pest management principle are needed.
Article 7, part 2: "and that it is therefore important to develop and use new plant-breeding techniques which respond to societal and agricultural demands and to be open to the technologies available in order to meet those needs and enhance the competitiveness of the agriculture and horticulture sectors;"	-	This text part clearly opens the door for genetic modification and similar technologies in plant breeding and employs a flawed approach of competitiveness. The agriculture and horticultural sector in the EU bases its competitiveness nowadays on the fact that it is still GMO-free and produces high quality products. A smart approach for the EU food sector is to focus on what they can do best and what sells best - quality production - and not to aim to imitate business models of multinational companies with no benefit to European producers or consumers.
Article 7, part 3: "expresses concern at the Commission's delay in assessing new breeding techniques, and calls on the Commission, as a matter of urgency, to clarify their regulatory status"	-	This text part clearly opens the door for genetic modification and similar technologies in plant breeding and employs a flawed approach of competitiveness. It is a myth that we would now need a breakthrough in inventing completely new crops. GM and similar technologies are not needed in plant breeding.
Article 8	-	This calls for accelerated breeding techniques (often similar to GMO techniques^y) to be funded via the EU research framework programme Horizon 2020. Huge amounts of EU research funds have already been spent for research connected to genetic modification, bringing no long term benefits for real sustainability. Horizon2020 should focus on real long-term sustainability.
Article 9, part 2: "the vast majority of"	-	All local and regional varieties, our genetic capital, should be maintained, as we cannot know the challenges of the future and what crops characteristics will be needed then.
Article 18, part 2: "suggests that such costs could be compensated for by extending the length of plant variety protection rights after a proper impact assessment;"	-	See recital M.
Article 21	-	Existing seed marketing directives have indeed also caused a lot of damage, as they have restricted market access to highly uniform

Text part in Paulsen report	Vote	Justification
		varieties. Landraces, farm-bred plant populations and varieties targeted at organic farming are excluded from the market.
Final Vote	-	The initiative report is not needed, it pushes forward many questionable assumptions and demands and should therefore be rejected.

ⁱ Paulsen report: <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+REPORT+A7-2014-0044+0+DOC+XML+V0//EN>

ⁱⁱ See also: *European Commission Standing Committee on Agricultural Research (SCAR) (2011): The 3rd SCAR Foresight Exercise - Sustainable food consumption and production in a resource-constrained world*. This report lines out that not only **productivity** must be in focus of future research, but also the question of **sufficiency** - how reduce waste production and over-consumption.

Some data as regards sufficiency: About 90 million tonnes of **food is wasted** annually in Europe - agricultural food waste and fish discards not included. see: <http://ec.europa.eu/food/food/sustainability/>

ⁱⁱⁱ The International Assessment of Agricultural Knowledge, Science and Technology for Development (IAASTD) is a unique international effort that evaluated the relevance, quality and effectiveness of agricultural knowledge, science, and technology (AKST), and the effectiveness of public and private sector policies as well as institutional arrangements in relation to AKST - with the aim to reduce hunger and poverty, improve rural livelihoods, and facilitate equitable, environmentally, socially and economically sustainable development. The project was a major global initiative, developed out of a consultative process involving over 400 experts and 61 countries from all regions of the world. The IAASTD was launched as an intergovernmental process, with a multi-stakeholder Bureau, under the co-sponsorship of the FAO, GEF, UNDP, UNEP, UNESCO, the World Bank and WHO. For more information on the governance structure of the IAASTD.

^{iv} IAASTD: Synthesis, page 33; On plant breeding and IPR: Global report, page 94 and page 478

^v These include techniques such as the transmission of isolated DNA, RNA, or proteins (invasion into the plant genome), cytoplasmic fusions, technologies that restrict the germination capacity of seed-propagated crops (e.g. Terminator technology), cell fusions (to overcome the plant specific crossing barriers).