

Brussels, 29 August 2023

To: Agriculture ministers of the European Union

Re: 05 September AGRIFISH Informal Council exchange of views on “New technologies for more sustainable and resilient agriculture”.

Dear Agriculture Minister,

On September 5th, at the Informal Meeting of the Council of Agriculture ministers, you will hold an exchange of views with other Member States on the topic of “New technologies for more sustainable and resilient agriculture”.

On this occasion, **IFOAM Organics Europe urges you to maintain a system-based approach to innovation and sustainability in the food and farming sector. We need to transition away from input-intensive, short-term fixes, which include the promotion of specific technologies with unproven benefits and potential unintended effects and risks, such as genetic engineering.** This call is also in line with the [common letter](#) to Executive Vice-President for the European Green Deal Frans Timmermans from May 2023, signed by 300+ organizations which called for evidence-based decision-making for sustainable food systems.

Innovation in plant breeding is necessary but it should not be reduced to the use of gene editing technologies. A product or an agriculture production system cannot be declared “sustainable” solely on the basis of a given plant variety, let alone a trait. **The alleged benefits of NGTs for sustainability, spanning from pest resistance to drought resistance, are currently based on assumptions and remain merely theoretical industry promises.** Genetic engineering and the trait-focused approach to breeding misleadingly give the impression that one can easily tweak the properties of a plant with no impact on other traits. But most crop properties are based on the interaction of many genes, and their expression is usually dependent on environmental and geophysical factors, including soil health, and interactions with other species. That is why few of the GMOs currently being marketed or researched address sustainability issues, such as climate change, that require the modification of complex traits. Instead, the new GMO pipeline focuses on modifying simple traits that benefit industrial agribusiness, such as non-browning fungi and questionable herbicide-tolerant crops. Furthermore, there are important [trade-off effects](#) in breeding, meaning that unintentionally, when selecting a specific trait, other traits might be altered or less pronounced.

Especially regarding pest resistance, the evaluation of the capacity of certain modifications to provide long-term resistance to pests or diseases needs to be assessed against alternatives and should be part of the risk assessment. Even if some plant varieties would be successfully genetically modified to develop a resistance towards a certain disease, a monogenous resistance is unlikely to last very long as diseases develop resistance themselves. Organic breeders and farmers know by experience that resistance based on a single gene or trait is broken by pathogens after a few crop

generations, leading to an unfruitful, perpetual spiral to search and develop new resistances to new pests.

The rich experience in organic agriculture over the past decades shows that an agroecological systems perspective of our food systems, which relies on a combination of strategies and tools and on interactions already taking place in nature, is what creates resilience. The organic principles of care, health, ecology, and fairness guide the vision that a truly sustainable agricultural system puts the preservation and improvement of soil fertility, genetic diversity, the conservation of natural resources, reducing harmful greenhouse gas emissions, and the striving for a stable ecological equilibrium at its core. In this perspective, resilience does not come from a specific crop or variety, but rather from the health and robustness of the agronomic system as a whole. **In other words, one trait cannot be called sustainable, as Annex III of the legislative proposal on NGTs suggests, only the cultivation of crops can take place sustainably.** Crops, no matter the breeding technique used, are not silver bullets – extensive experience in the breeding sector shows that there are no shortcuts to circumvent the complexity of our agroecosystems.

The European Green Deal, the Farm to Fork, and the EU Biodiversity Strategies rightfully put organic farming at the core of a transition to sustainable food systems, with a target to expand European agricultural land under organic production to 25%. This is a welcome and necessary recognition of the environmental benefits of such agroecological approaches that are better suited to deliver long-term results both in terms of sustainability and in terms of preventing the apparition of resistant pests and diseases. **Hence, Member States have to ensure that the legislative proposal allows for the continued growth of the organic food and farming movement in Europe in order to develop sustainable agriculture.**

IFOAM Organics Europe fully agrees with the prohibition of all NGTs from organic production. The prohibition is in line with the precautionary principle and the principles of organic farming as well as the clear demands from organic operators in Europe. Indeed, the overwhelming majority of organic producers stands firmly against the use of NGTs in organic agriculture and wants their production process to remain free of gene editing technologies.

The success of organic farming depends on consumers' trust in the integrity of the organic supply chain. **Traceability and labelling of all GMOs including NGTs are essential to protect the organic market and the reputation of organic products.** Consumers' trust in organic products would be undermined, and the organic market would be put at risk in the case that NGTs would be de facto allowed in organic production, or if organic operators would not have the legal means to ensure that no GMOs, including crops derived from both Categories 1 and 2 NGTs, are used in the organic production process.

Therefore, the obligation to avoid NGTs in the organic production process needs to be matched with the corresponding legal and technical means to enforce it. It is therefore essential to maintain a traceability system all along the supply chain. **The same provisions on traceability and labelling that apply to Category 2 NGTs (according to the Commission's proposal) should therefore also apply to Category 1 NGTs.** Organic producers need to be equipped with the right legal means to fulfill the prohibition of NGTs in organic production.

Hopes of benefits based on assumptions should not lead to dismantling crucial biosafety regulations, that have so far contributed to the competitiveness of European agriculture and to the quality reputation of European food products both on the internal market and on export markets. Maintaining traceability and labelling on the use of gene editing technologies is also crucial to



prevent a takeover of the European breeding sector by the large biotech and pesticide companies who own the patents, and who use the patent system to build monopolies on genetic material and traits, at the detriment of the hundreds of SMEs that make the richness of the European breeding sector. Policy-makers should pay full attention to who will be the winners and the losers of the promotion of specific technologies. **The organic food and farming movement urges you, as agriculture ministers, to keep in mind that access to genetic resources, the preservation of a gene pool free of genetic modification and of monopolistic intellectual property rights, and independent breeding capacity are essential for the food sovereignty of the European Union.**

We thank you for your consideration of these arguments and count on your support in maintaining a system-based perspective on sustainability and innovation in the European agricultural sector.

Yours sincerely,



Eduardo Cuoco
Executive Director
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