

## EuropaBio comments on the proposals to nationalise the approval of GM crops for EU cultivation

On 13 July, the Commission announced measures intended to devolve the responsibility and decision making on whether or not to cultivate GM crops, to Member States. Please find below a series of principles the green biotech sector believes must be central to any new workable approval system. We would welcome your support for these principles we highlight below.

The green biotech sector understands the Barroso vision that enables Member States to progress at their own pace with GM crop cultivation.

### Principles

1. Any new framework (including new co-existence measures) that aims to move GM cultivation forward must be science-based, proportionate and non-discriminatory.
2. European farmers should have the choice to grow the products and technologies that work best for them.
3. Co-existence measures must allow for the existence of all production methods without discrimination.
4. An impact assessment measuring potential economic impacts on farming and the internal market should be included.
5. Co-existence measures should enable, rather than prevent, the use of approved GM products.
6. Legislation should support innovation and a flourishing biotech sector.

### Concerns

The green biotech sector is concerned that there is a fundamental disconnect between the Barroso vision – “...*freedom of the Member States to decide whether or not they want to cultivate biotech plants*” - and the proposals under consideration. Farmers, food producers and the agricultural community would be deeply concerned if the new approach would:

1. Undermine the legally established 0.9% labelling threshold by permitting the use of a range of alternate thresholds. This may trigger legal disputes involving authorities and operators (farmers, buyers, producers).
2. Abuse coexistence measures for the sake of denying existence of certain products or technologies.
3. Run contrary to the EU internal market principles, by allowing a proliferation of different national or regional restrictions and conditions.
4. Undermine the scientific basis and the credibility of EFSA’s assessments.
5. Make it more difficult for Member States to allow farmers to choose which products to grow by creating legal uncertainty.
6. Create a precedent that would imply that other sectors, and other nations, could use non-scientific reasons to reject the approval of products despite a positive safety assessment by the EU scientific authorities (EFSA).