

Please respond to  
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**open letter**

EU Commissioner  
**Mr Vytenis Andriukaitis**  
Directorate General for Health and Food Safety  
B - 1049 Brussels

cc

**Mr Jean-Claude Juncker**, President of the EU Commission  
and

**Mr Manfred Weber**, lead candidate for the European People's Party (EPP) in the upcoming  
European election

**Mr Frans Timmermans**, lead candidate for the Party of European Socialists (PES) in the  
upcoming European election

**23 May 2019**

*Call to stop pending EU applications for genetically engineered plants*

Dear Mr Andriukaitis

We are writing to you to share our concerns about the pending EU applications for genetically engineered plants that have already been assessed by the European Food Safety authority (EFSA). The Bund für Umwelt und Naturschutz Deutschland (BUND), Corporate Europe Observatory (CEO), European Network of Scientists for Social and Environmental Responsibility (ENSSER), Friends of the Earth Europe (FOEE), Gene Ethical Network (GeN), GeneWatch UK, Global 2000, IG Saatgut, Save our Seeds (SOS), Slow Food Germany, Small and Family Farmers (AbL), Testbiotech and several other organisations (see below) would like to ask the current EU Commission not to approve these applications for the following reasons:

- most applications for import concern a combination of different genetically engineered characteristics, so-called traits. However, the combinatorial health effects that may emerge at the stage of consumption were not tested.<sup>1</sup>
- most of the applications for import concern herbicide resistant plants. However these plants were not tested in field trials under realistic agronomic conditions and the material produced

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<sup>1</sup> see for example [www.testbiotech.org/node/2331](http://www.testbiotech.org/node/2331)

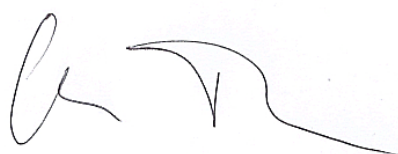
from these plants for risk assessment is not equivalent to the products that would be imported.<sup>2</sup> This contradicts the requirements in EU law.

- many of the applications concern crop plants producing several *Bacillus thuringiensis* (Bt) toxins developed to kill pest insects. These Bt toxins add up to high concentrations in relevant products such as maize gluten and, for example, might be mixed in food and feed diets with soybean allergens. There are several publications indicating that immune reactions can be caused by these toxins, however, no data were requested to demonstrate safety of the relevant products.<sup>3</sup>
- some of the applications concern maize for cultivation (maize Bt 11 and 1507 and re-authorisation of maize MON810). However, no data were requested from the applicants to assess potential gene flow to wild relative teosinte populations such as those in Spain.<sup>4</sup>
- one of the applications concerns genetically engineered maize (MON87411) producing double stranded RNA (dsRNA). The dsRNA is supposed to affect specific insects feeding from the roots (corn rootworm), but the biologically active molecule is also produced in other parts of the plants. The impact for health safety of the consumption of products derived from the maize can currently not be assessed sufficiently due to the complexity of the underlying biological mechanisms.<sup>5</sup>

In the light of these findings and backed by many EU Parliament resolutions<sup>6</sup>, we ask you

- not to approve the pending applications based on current EFSA opinions;
- to prepare to establish higher standards for risk assessment, taking into account various gaps as identified above;
- to prepare to re-organise the responsibility for the protection of health and the environment in the upcoming new EU Commission to make sure that the protection of health and the environment is given the highest priority in the GMO policy of the EU.

With kind regards, also in the name of the organisations signing (see below)



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2 see for example [www.testbiotech.org/node/2330](http://www.testbiotech.org/node/2330)

3 see for example <https://www.sciencedirect.com/science/article/pii/S1567576918302467> and [www.testbiotech.org/node/2304](http://www.testbiotech.org/node/2304)

4 see: [www.nature.com/articles/s41598-017-01478-w](http://www.nature.com/articles/s41598-017-01478-w)

5 see for example: [www.efsa.europa.eu/de/supporting/pub/en-1424](http://www.efsa.europa.eu/de/supporting/pub/en-1424) and [www.efsa.europa.eu/en/supporting/pub/en-1246](http://www.efsa.europa.eu/en/supporting/pub/en-1246)

6 [www.greens-efa.eu/files/doc/docs/e491b1b487e5c6b48f553e1ef027bccf.pdf](http://www.greens-efa.eu/files/doc/docs/e491b1b487e5c6b48f553e1ef027bccf.pdf)

List of signing organisations:

Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL), [www.abl-ev.de/](http://www.abl-ev.de/)  
Arche Noah, [www.arche-noah.at/](http://www.arche-noah.at/)  
Agri-Activism UK, [www.facebook.com/pages/category/Community/Agri-activism-UK-1623654241040911/](https://www.facebook.com/pages/category/Community/Agri-activism-UK-1623654241040911/)  
ARGE Gentechnik-frei, [www.gentechnikfrei.at/](http://www.gentechnikfrei.at/)  
Beyond GM, <https://beyond-gm.org/>  
Bioland e.V., [www.bioland.de/ueber-uns/bioland-ev.html](http://www.bioland.de/ueber-uns/bioland-ev.html)  
Bundesverband Deutscher Milchviehhalter e. V. (BDM), <http://bdm-verband.org/html/>  
Bundesverband Naturkost Naturwaren (BNN) e.V., [www.n-bnn.de](http://www.n-bnn.de)  
BUND Naturschutz in Bayern e.V. (BN), [www.bund-naturschutz.de](http://www.bund-naturschutz.de)  
Bund für Umwelt und Naturschutz Deutschland (BUND), [www.bund.net/](http://www.bund.net/)  
Corporate Europe Observatory (CEO), <https://corporateeurope.org/en>  
Deutscher Naturschutzring (DNR) e.V., [www.dnr.de](http://www.dnr.de)  
Die Freien Bäcker e.V., [www.die-freien-baecker.de/](http://www.die-freien-baecker.de/)  
EcoNexus, [www.econexus.info](http://www.econexus.info)  
European Network of Scientists for Social and Environmental Responsibility (ENSSER), <https://ensser.org/>  
EUROPAEM e.V., European Academy for Environmental Medicine, [www.europaem.eu](http://www.europaem.eu)  
FIAN Deutschland, [www.fian.de](http://www.fian.de)  
Forschung & Züchtung - LBS Dottenfelderhof e.V., [www.forschung-dottenfelderhof.de](http://www.forschung-dottenfelderhof.de)  
Friends of the Earth Europe (FOEE), [www.foeeurope.org/](http://www.foeeurope.org/)  
Gäa e.V.- Vereinigung ökologischer Landbau, [www.gaea.de](http://www.gaea.de)  
Gene Ethical Network (GeN), <http://gen-ethisches-netzwerk.de/>  
GEN Genetic Engineering Network UK, <http://www.genetwork.info/>  
GeneWatch UK, [www.genewatch.org/](http://www.genewatch.org/)  
Global 2000, [www.global2000.at/](http://www.global2000.at/)  
GM Free Cymru, [www.gmfrecymru.org.uk/](http://www.gmfrecymru.org.uk/)  
GM Freeze, [www.gmfreeze.org/](http://www.gmfreeze.org/)  
GMWatch, [www.gmwatch.org/en/](http://www.gmwatch.org/en/)  
grassroots foundation, [www.grassroots.de/](http://www.grassroots.de/)  
IG Saatgut, [www.gentechnikfreie-saat.org/](http://www.gentechnikfreie-saat.org/)  
Naturschutzbund Deutschland (NABU), [www.NABU.de](http://www.NABU.de)  
Navdanya International, [www.navdanyainternational.org](http://www.navdanyainternational.org)  
Noah, Friends of the Earth Denmark, <http://www.noah.dk/>  
Ökologischer Ärztbund e.V., ÖÄB, [www.oekologischer-aerztebund.de](http://www.oekologischer-aerztebund.de)  
OGMDangers, [www.OGMDangers.org](http://www.OGMDangers.org)  
Sativa, [www.sativa-biosaatgut.de/](http://www.sativa-biosaatgut.de/)  
Save our Seeds (SOS), [www.saveourseeds.org/](http://www.saveourseeds.org/)  
Slow Food Germany, [www.slowfood.de/](http://www.slowfood.de/)  
Testbiotech, [www.testbiotech.org](http://www.testbiotech.org)  
Verband Katholisches Landvolk e.V., [www.landvolk.de](http://www.landvolk.de)  
WeMove Europe, [www.WeMove.EU](http://www.WeMove.EU)  
Za Zemiata, Friends of the Earth Bulgaria, [www.zazemiata.org](http://www.zazemiata.org)  
Zivilcourage, [www.zivilcourage.ro](http://www.zivilcourage.ro)  
Zukunftsstiftung Landwirtschaft, [www.zukunftsstiftung-landwirtschaft.de](http://www.zukunftsstiftung-landwirtschaft.de)