

To:

the President of the European Commission, Mrs Ursula von der Leyen,  
the President of the European Parliament, Mr David Sassoli.  
the President of the European Council, Mr. Charles Michel,  
cc: the European Commissioners responsible for the European Green Deal;  
Health and Food Safety; Environment; Agriculture; Trade; Innovation,  
Research, Culture, Education and Youth.

Re: modern biotechnology - innovation, governance and public debate

11 May 2020

Dear Mrs von der Leyen, Mr. Sassoli, and Mr. Michel,

I write on behalf of the Steering Committee of the Public Research and Regulation Initiative (PRRI), a world-wide initiative of public sector scientists active in modern biotechnology for the common good.

The European Green Deal, the Farm to Fork Strategy and other EU level policy statements recognise that the world is faced with the challenge of producing enough, nutritious and safe food in a sustainable manner and under escalating developments such as climate change, environmental degradation, and global population dynamics. This already daunting task will be further compounded by crises such as pandemics. COVID-19 was a stark reminder that even the perception of food shortages results in social unrest. The Global Report on Food Crises 2020 illustrates the need to strengthen local food security.

These challenges demand *strong innovation, excellent governance and well-organized societal debate.*

### **1. Strong innovation**

To protect and feed the planet, we need innovation in many areas. The first Earth Summit (1992, Agenda 21) already recognised that biotechnology can contribute significantly to human well-being and the environment, and the Biodiversity Convention enshrined that biotechnology is essential for the objectives of the Convention. It is for those reasons that many public researchers in developing and developed countries dedicate their careers to biotechnological research. With this perspective, it is imperative that the EU maintains an environment that is conducive to research and innovation. We call upon the European Commission to emphasize this in relevant policy documents such as the European Green Deal and the Farm to Fork strategy.

### **2. Excellent governance**

PRRI strongly supports the balanced approach towards modern biotechnology laid down in Agenda 21 and endorsed in subsequent World Summits, which can be summarised as “maximising the benefits and minimising potential risks “. Maximising benefits of biotechnology requires forward-looking research budgets, and we commend the Commission for recognising biotechnology as a Key Enabling Technology in the EU R&D programmes. As regards minimising risks: biosafety regulations allow governments to make informed decisions whether organisms with novel genetic combinations could have unintended effects that would outweigh the anticipated benefits. The EU legislation on genetically modified organisms (GMOs) has only for a few years functioned effectively as a tool for informed decision-making, but has gradually come to a deadlock as a result of politicised decision making, not rarely with indiscriminate reference to the precautionary principle.

To prevent further stagnation of important public research and innovation, we recommend that the EU institutions and the EU Member States ensure the following:

- a) *Proportionate differentiation of regulatory requirements.* We call on the EU institutions and the Member States to identify categories of GMOs for which sufficient knowledge is available to exempt those categories from part or all of the regulatory requirements. In addition, we call on the Commission to explore ways through which Annex I B of the Directive 2001/18 can best be updated.
- b) *Addressing uncertainty about the status of organisms developed through new techniques.* New breeding techniques are debated worldwide, because they can result in organisms that are indistinguishable from their conventional counterparts, which raises the question which of those organisms fall under biosafety regulations. The general picture that is emerging from this global debate is that some of these organisms fall under the regulatory definitions, while others do not. This discussion has not yet been settled in the EU. A 2018 ruling of the ECJ has resulted in much uncertainty, and the Council of the EU has asked the Commission for a study on the status of organisms developed through genomic techniques under Union Law. Different interpretations of regulatory definitions have significant negative impacts on international collaborative research and trade. We therefore call on the EU institutions to ensure that the interpretation, and if necessary also the text, of the EU GMO definition is as much as possible aligned with the corresponding definition of the Biosafety Protocol, to which the EU is party, together with over 170 countries.
- c) *Evidence-based and responsible decision making.* We call on the EU institutions and the Member States to base decisions in this field on sound science and evidence. It is thereby important to remain aware that the precautionary approach (Rio Declaration, 1992) is a tool for decision making in cases where - as ECJ jurisprudence and EC guidance underline – scientific risk assessment has identified significant risks and uncertainties. Further, responsible decision-making also requires assessing the consequences of decisions on research and innovation in developing countries.

### **3. Well-organized societal debate**

As the European Commission has stated: in the interest of food security, no form of agriculture should be excluded in Europe. With other words: the future of agriculture does not lie in a choice between one or another technology, but in a combination of various approaches, tailored to local needs and environments. This will also require a well-organized societal debate. We call on the Commission to provide the general public with clear information about the challenges in food production and potential solutions. We encourage the European Parliament to hold evidence-based debates to discuss the challenges in food production, potential solutions, the consequences of adopting and not adopting certain solutions, as well as the impacts of European policies and decisions on developing countries.

We stand ready to provide further clarification and to assist with the above

Very sincerely



Em. Prof. Marc Baron Van Montagu, President of the Public Research and Regulation Initiative,  
World Food Prize Laureate 2013