

Brussels, 10 December 2019

Dear Commissioner,

The undersigned organisations strongly support the EU to take urgent action on climate change, the environment, social justice, and making agriculture fair and sustainable.

However, we believe that two elements that currently feature in the European Green Deal plans, **run counter to the Green Deal's sustainability objective, and should therefore be taken out:**

1. The plans mention the so-called "**Innovation Principle**" that should be reflected "in all EU legislation". We are convinced that the mistake made by the last Commission, to promote a [construct invented by the oil, chemical and tobacco industry](#) that was designed to weaken the EU's health and environmental protections, should not be repeated. In March 2019, over 70 civil society organisations [released a statement](#) calling for the innovation principle to be removed from HorizonEurope.

Indeed, it is **unnecessary as a tool to support innovation** for society's benefit. A main claim by supporters of the innovation principle is that it is needed to spur innovation for sustainability. However, this conveniently ignores that not all innovation is good innovation. For innovation to work for the public good, it must not harm people or the planet. It is the role of regulators to guide innovation in the right direction for the good of society.

In fact, it has been shown that **regulation spurs innovation**. This includes real implementation of the precautionary principle. Regulation has helped to bring new, safer chemicals to market and encouraged innovations that shifted away from ozone depleting substances. Furthermore, it is not always the case that new technologies and products are the right solutions to ensure a sustainable future – better policies and regulations are crucial too. This principle does not exist in European or International law and can be interpreted broadly, including in directions opposed to responsible innovation and sustainability.

2. The plans also talk about actions to develop "**new genomic techniques**", supposedly as a way "to adapt to climate change and improve sustainability of food systems".

Evidence from research and practice suggests that a food production system that is able to adapt to a changing climate, needs an approach based among others on short supply chains, soil improvement, crop genetic diversity and locally adapted varieties that respect farmers' and breeders' rights. Classical breeding programmes have already [made substantial advances](#) in this respect, while evidence that simple traits brought in through genetic engineering contribute to drought-tolerance, for instance, is lacking.

Agrichemical corporations like Dow (Corteva), Bayer and Syngenta are heavily lobbying the Commission to exclude GMOs derived from genome editing from EU GMO regulations. This would mean that EU requirements for risk assessment, traceability and labelling no longer apply to them. However, these new GMOs come with many risks and uncertainties, therefore **they need to be subject to risk assessment**. Many consumers, breeders and farmers want to be able to avoid GMOs, so these new GMOs need to be **traceable and labelled**.

This lobby campaign follows a [ruling by the European Court of Justice](#) of 25 July 2018 which confirmed that products derived from genome editing are covered by the EU's GMO regulations. [Environmental and farmer groups](#), together with the [organic sector](#), as well as [food retailers and food manufacturers](#) (e.g. REWE, Edeka and Spar) and [scientists](#) are asking for a [full implementation](#) of the ruling.

Engagement with civil society will be a key element for success of the European Green Deal. The signatories of this letter look forward to your response, and remain at your disposal to discuss the points we have raised.

Yours sincerely,

