JOINT STATEMENT

Freedom of Choice only possible through labelling and traceability of NGT-GMOs

Counterstatement on the position of Copa-Cogeca and 26 other pro-GMO organisations concerning the deregulation of plants obtained through NGTs

May 2025

As stakeholders in the agri-food sector[1] we call on EU policymakers to ensure the **freedom of choice and rights for consumers, supply chain operators, farmers and breeders** by upholding **mandatory labelling** of new GMOs obtained by **New Genomic Techniques (NGTs)** as well as **traceability** across the entire value chain.

The use of NGT-GMOs in agriculture calls for a **rigorous, science-based regulatory framework** to **protect consumer rights** and the **NGT-GMO-free conventional and organic food systems**.

[1] including organic seed breeders, farmers, supply chain operator, consumer and environmental organisations

Leading scientific bodies, consumer advocates and farmer and environmental organisations stress that **labelling and traceability** of NGT-plants and products are **essential requirements—not optional measures—**for maintaining **transparency, accountability** and **freedom of choice** for consumers, farmers[2] and the food sector across the whole supply chain.

Plants produced with NGTs are GMOs and should be regulated as such.

1. Freedom of Choice and the Right to Information

The **absence of mandatory labelling and traceability** prevents consumers from exercising their **right to informed choice**. Without knowledge of whether a product contains or is derived from genetically modified material—including NGTs—**consumer autonomy is compromised.**

This violates established norms of **transparency in the food system** and threatens **public trust.** The **Treaty on the Functioning of the European Union (TFEU)** is clear about consumers protection rights and the need for consumer information. Moreover, under **EU Food law, traceability is a fundamental and legally binding requirement.**

2. The risk of seed contamination and the threat to the European organic and GMO-free sector

In order to keep the organic and GMO-free sectors' value chain **free from NGT-GMOs**, food production has to be protected against **contamination**.

The existing **EU law on GMOs** sets a **minimum standard** for the regulation of NGT-GMOs: Through **traceability and labelling** it has always been possible to protect GMO-free food in the EU, as strict separation of GMOs and GMO-free products has been enforced during **cultivation, harvest, processing and storage.**

[2] Which are formally recognized in the International Treaty on plant genetic resources for food and agriculture and the United Nations Declaration on the rights of peasants and other people working in rural areas.

As more than **two hundred organisations** have warned, **without mandatory labelling and traceability** in cultivation, it will be extremely difficult **to control and prevent the contamination** of non-GMO and organic seed stocks with NGT-GMOs – through unregulated seed distribution, cross-pollination and unintended contamination in machines or storage places.

The **future of the organic and GMO-free farming and food sectors** would be in danger.

Keeping seeds GMO-free is a foundational pillar of GMO-free agriculture. Once contamination occurs, it becomes **difficult—if not impossible—to restore non-GMO status**.

Even small-scale field releases of NGT-GMOs may lead to **irreversible genetic drift**, with long-term consequences for **biodiversity and farming sovereignty**.

Furthermore, once contaminated, **conventional and organic seed systems** may face **legal risks** and **economic burdens**, including loss of certification, reduced market access, and liability conflicts between seed producers and NGT-GMO developers[3][4]. These risks can **only** be mitigated through **robust, mandatory traceability**, and the **obligation to publish detection and identification methods.**

3. Traceability and Detection: Scientific Feasibility and Economic Justification

Claims that traceability and labelling would result in unjustified economic costs and trade disruptions fail to account for both the **feasibility of detection methods** and the long-term **economic consequences** of unregulated NGT-GMO deployment.

[3] As for now, the developers of GMO-NGTs are not liable for any ecological or economical damage concerning contamination. Buchholz 2025: GGSC legal opinion on liability in event of deregulation of NGT

[4] This has serious (economical) consequences for farmers and breeders: Eurovia 2025: New patented GMOs, seed market reform

Food labelling is a long established practice in the EU. It depends on traceability. Scientific bodies such as **ANSES**[5] emphasise that **many NGT-GMO modifications can be detected** with existing or emerging molecular tools.

For **reliable traceability and labelling**, producers of GMO-NGTs should remain obliged to **publish the detection method** of genetic modifications obtained by NGTs along with **appropriate plant material.**

Traceability also ensures accountability and enables **targeted monitoring** to detect the source of **adverse effects and contamination incidents,** or in the case of **trade-related disputes.** Without labelling and traceability, the **burden will unduly fall on the food sector**. The **burden of proof** in case of contamination or damage **should obviously lie with those who** are putting the product in the market, this is, the **developers and producers of NGTs**.

4. Informed choice depends on consumers having easy access to honest information

Providing **honest information to consumers** can only be guaranteed if the providers of the information do not have **conflict of interest** and if the information provided is **comprehensive**. The scientific community has clearly stated that **NGT-GMOs can carry risks to human health and nature**[6]. Consumers **should therefore be informed** that NGT-GMOs could have effects to their **health in the form of toxins and allergens**. This is the reason why scientists and civil society groups ask that **NGT-GMOs are not exempted from undergoing risk assessment and post release monitoring.** The **European Court of Justice** ruled in 2018 that **NGT-GMOs should not be liberated from these provisions.**

[5] National Agency for Food Safety France

[6] Frontiers 2023: A perspective from the EU: unintended genetic changes in plants caused by NGT—their relevance for a comprehensive molecular characterisation and risk assessment

Conclusion

Removing traceability and labelling of NGT-GMOs undermines not only the **fundamental rights of 450 million EU-citizens,** but also the **integrity of NGT-GMO-free agriculture**.

Without **legally binding rules** on labelling and traceability, the spread of NGTs will **compromise the possibility to maintain NGT-GMO-free food production**—starting from the **seed level**.

An **appropriate regulatory approach** is essential to ensure that NGT-GMOs are managed in a way that upholds **democratic rights, freedoms, and the public interest**. These principles cannot be maintained without **transparency, labelling and traceability.**

Note

We would like to point out that this statement focusses on the topic of **traceability and labelling.** For information on other **unresolved and equally important issues** such as **coexistence, risk assessment, monitoring, opt-out, liability, patents, detection and identification methods and the scope of the proposal (including wild plants),** see hyperlinks below.

Signatories

EU and international organisations

Biodynamic Federation Demeter International

Corporate Europe Observatory

European Consortium for Organic Plant Breeding (ECO-PB)

Foodwatch

Friends of the Earth Europe (FoEE)

Greenpeace

IFOAM Organics Europe

Save our Seeds

National Organisations

Aegilops Network for biodiversity and ecology in agriculture

AGROLINK Association Bulgaria

AÖL e.V.

Apfel:gut e.V.

Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL)

AgroCert s.r.o

Beyond GM

Bioland e.V.

BIOSELENA Foundation for Organic Agriculture Bulgaria

Bio-Verband Erde & Saat

Bulgarian Organic Products Organization

Bund Ökologische Lebensmittelwirtschaft e.V.

Bundesverband Naturkost Naturwaren (BNN) e.V.

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Gen-ethisches Netzwerk e.V.

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