



EUROPEAN FEDERATION OF
BIOTECHNOLOGY

To the Members of the European Commission

28 April 2008

Dear Commissioners,

The European Federation of Biotechnology, EFB, was very interested to hear that the College of Commissioners will be holding an Orientation Discussion with regard to biotechnology, and in particular with regard to Genetically Modified (GM) crops and the EU approval system. We therefore take this opportunity to share with you the position of EFB as the voice of life sciences in Europe.

Europe has – in principle – a workable, transparent and science-based GM product approval system, and a competent, professional and independent regulatory agency, the European Food safety Authority (EFSA), which is mandated with securing independent scientific advice. There is no need to review the regulatory approvals process itself.

1. The problem is not at the level of the regulatory approvals system, but at the political level, where politicians routinely overturn or disregard the decisions of their own regulatory agency in spite of the fact that this agency operates under a mandate, procedures and rules set down by the European Union.
2. While the approvals process can be further streamlined, this should be done through the implementation at a political level in Europe of a deeper respect for the science-based regulatory approvals process that the European Union has itself established, and through the elimination of political interference in the process or at the request of pressure groups.
3. Most importantly: The world is currently experiencing the beginnings of a global food crisis, and any further delay will have human consequences globally. Even a well intentioned effort to overhaul the regulatory approvals process would be inappropriate if this would result in any sort of moratorium on GM crops. This would not only be detrimental to Europe itself in terms of research, innovation and competitiveness, society, and the explicit objectives of the

Knowledge Based Bio Economy, it would be unethical to take any decision now which would further hinder, delay or postpone the current approvals process, approvals currently underway and the authorization of approved crops to be planted.

Our view is that there is a need for a clear & consistent policy within the Member States on biotechnology to achieve the goals set at the Lisbon, Stockholm and Barcelona Councils

Uniting pro-action with pre-caution

Science and Technology policy is increasingly relevant to the forefront of public debate on solutions for the global food and feed crisis. A year ago, this crisis was a Malthusian projection for debate – today it is reality that requires unified action.

In Europe, over the last twenty years, we have witnessed a worrying erosion of confidence in science, in both the public and private sectors – in particular where genetically modified (GM) crops are concerned.

The end-result for Europe is an over-regulated situation which has deterred research or driven it out of Europe; discouraged innovation and investment, caused mounting difficulties with trading partners and placed European agriculture in crisis. Worst still, as Europe is the largest agricultural importer in the world, the effects of this regulatory situation is exported to all the countries that wish to send agricultural exports to Europe – creating confusion in the minds of policy makers - particularly in the developing world - deliberating the implementation of national biosafety legislation. This, now more than ever, is having major and unacceptable consequences at a global level.

At the same time, the life sciences and biotechnology are defining priorities in the concept of a Knowledge-based Bio-Economy for Europe, embodied in the statement of the Lisbon objective, and endorsed in the European Strategy for the Life Sciences and Biotechnology, (2002) by the elected European Parliament & the Council of Ministers of the Member States – and drawn up by the Commissioners responsible for Agriculture, Environment, Industry, Research, Health & Consumer Protection, and Trade.

Solutions are urgently needed to sustain agricultural productivity – and biotech crops are one of the key resources that are at our disposition.

For the Orientation Discussion regarding aspects of biotechnology at the College of Commissioners, we refer to the annexed document “Considerations for the Orientation Discussion” that gives a

scientific perspective on the GM crop approval system and identifies the need to empower public sector scientists in the debate.

EFB would recommend analysis of the following questions in the discussions:

- What is the price of delays incurred by over-regulation in Europe and elsewhere;
- What would be the consequences of not streamlining approvals for GM crops and how can this be done without causing any additional delays or moratorium
- What can be done to remedy the situation to ensure political commitment to respect the science-based approvals process and Europe's own excellent expert advisory bodies without threat of political intervention?

We wish you a successful discussion, and would welcome any opportunity to meet in person with Members of your College.

In case you have any further queries, please do not hesitate to contact me, or EFB Secretary General Christian Suojanen at christian@efb-central.org

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Montagu', written in a cursive style.

Em. Professor Marc Van Montagu
President
European Federation of Biotechnology