Date: 24 September 2025
Subject: Safeguarding Agriculture, Biodiversity, and Public Trust – Comments on Regulation of New Genomic Techniques (NGTs)

Honorable EU Agriculture Minister,

The IFOAM Seeds Platform[1] is an officially sanctioned Sector Platform of IFOAM – Organics International [2], the global organic movement of which IFOAM Organics Europe is a member. We write to you on behalf of a vast global network of farmers, breeders, scientists, businesses and citizens committed to organic, agroecology and related forms of truly regenerative agriculture[3]. Our allies span all continents, from local agri-food systems to global trade, across a full range of stakeholders and occupational interests. We welcome this opportunity to propose an inclusive, practical way forward on the highly complex topic of regulation of new Genetically Modified Organisms, derived by so-called "new genomic techniques" (NGTs).

The trilogue negotiations on the legislative proposal on NGTs have been marked by highly politicized discussions, significant divergences in the positions of the EU institutions and consequently delays in reaching a final agreement. Issues around risk assessments related to environmental release and human health, patents and intellectual property, and transparency, traceability and labeling all still require a more robust, logical, inclusive and fair compromise.

The IFOAM Seeds Platform has developed a workable solution: Our Global Safety & Risk Assessment Protocol for New Genomic Technologies[4] concisely outlines the spectrum of issues being raised by stakeholders who will be affected by the outcomes of the trilogue negotiations. Our proposal is a scientifically grounded, practical framework designed to protect ecosystems, citizen trust, human health and safety, and assure optimal support for businesses and the food supply chain.

While we and our allies underscore our support of innovation that is ecological, transparent, and participatory, we have also consistently seen no evidence to support anything but a precautionary approach to genetic engineering, and continue instead to advocate for and contribute to innovations in line with organic principles[5]. As such, as a global alliance we continue to exclude the usage of NGTs for the purposes of organic agriculture, as outlined in our position paper on genetic engineering and breeding techniques[6].

We acknowledge that the scientific development of NGTs is ongoing and their marketization could increase in the future[7]. As artificial intelligence accelerates its capabilities, forward-thinking regulation becomes more urgent, not less. Our governance must be equally sophisticated and responsible. Detection methods and technologies[8] are also becoming more sophisticated – a valuable tool policymakers should support and further develop as part of a robust regulatory framework.

[1] https://seeds.ifoam.bio/
[2] https://www.ifoam.bio/
[3] https://www.ifoam.bio/news/elevating-truly-regenerative-agriculture
[4] https://seeds.ifoam.bio/wp-content/uploads/2025/05/Global-Safety-Risk-Assessment-Protocol-v1.pdf. For other language translations, go to https://seeds.ifoam.bio/key-resources/.
[5] https://www.ifoam.bio/why-organic/shaping-agriculture/four-principles-organic
[6] See https://www.ifoam.bio/genetic-engineering-and-genetically-modified-organisms and https://www.ifoam.bio/compatibility-breeding-techniques-organic-systems.
[7] https://www.enga.org/fileadmin/user_upload/New_GMOs_Market_Report.pdf
[8] See for example https://www.sciencedirect.com/science/article/pii/S096399692501556X.

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NGTs are a far-reaching technology, but they should by no means be thought of as a silver bullet – and currently do not meet any of their purported sustainability promises. A more holistic solution is necessary. There are well-documented, effective alternatives to genetic engineering and NGTs. Organic and agroecological systems are proven to enhance resilience, productivity, and biodiversity while supporting farmer livelihoods[9].

NGTs, by contrast, especially if allowed without well-rounded and transparent risk assessment, offer a narrow fix, liable to repeat the cycle of dependency and ecological harm that earlier genetic engineering applications have created[10]. Any claims toward urgency to bring NGT products to market or environmentally release them without adequate risk assessment are based on incomplete understanding of ecology, and/or economic incentives that would expose the public to undue risks for sake of the profit by select industry parties.

Within the legislative process in the EU, the full spectrum of issues related to NGTs as outlined in our Risk Protocol need to be taken into consideration, not the least of which include adequate proof of claims of "precision" of any given NGTs, and transparency of information throughout the process leading to an environmental release. We also respectfully point out that the European Union member states, as signatories to the Cartagena Protocol, must take heed of this international agreement and their corresponding commitment to adequate risk assessment of NGTs[11]. Adopting and enforcing the Global Safety & Risk Assessment Protocol for New Genomic Technologies should fulfill obligations under this agreement.

Failure to regulate NGTs adequately will have consequences on ecosystems, human health risks, and undermining trust in food systems with spillover impacts on regional and global trade. The potential impact of NGTs is so far-reaching that both social and natural sciences must be taken into consideration by policymakers. Our NGT Risk Protocol encompasses both disciplines.

Genetic engineering is one of humanity's most powerful tools ever invented — arguably more powerful than ourselves. The EU remains a globally significant regulatory bastion through which these novel genomes may be regulated - its current regulatory frame on GMOs presenting a key component in contributing to the competitiveness of EU agriculture globally. Your decision will shape agriculture, environment, and trade far beyond Europe's borders.

We remain available for any exchanges to discuss the NGT Risk Protocol in further detail.

We stand ready, with our global network, to remain engaged for the maximum benefit to humanity and the planet.

With respect and urgency,

IFOAM Seeds Platform
contact: David Gould, General Secretary – seeds@ifoam.bio

[9] https://www.organicseurope.bio/content/uploads/2022/04/IFOAMEU_advocacy_organic-benefits-for-climate-and-biodiversity_2022.pdf?dd and https://ota.com/sites/default/files/docs/The%20Science%20Behind%20Organic_update.pdf
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