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Commissioner Stella Kyriakides  
European Commissioner for Health and Food Safety

22 July 2020

**Subject: Transparency in stakeholder consultation on new GMOs**

Dear honourable Commissioner Kyriakides,

As you are well aware, the European Commission has carried out a targeted [consultation with EU-level stakeholders to gather information for a study on new genomic techniques](#), which is anticipated to be delivered in April 2021.

Following a meeting in February 2020, the participatory EU-level stakeholder organisations answered a questionnaire on the implementation and enforcement of GMO legislation, their researches on new genomic techniques and related products, potential benefits and opportunities, potential challenges and concerns, their view on safety of NGTs, ethical aspects and the labelling of resulting products.

The selection of involved stakeholders was proceeded by DG Sante, based on their own assessment of stakeholders. This process included requests to non-involved disciplines, such as cosmetic and pharmaceutical industry, as well as the agriculture machinery sector. Furthermore, they proceeded on an extremely biased selection of stakeholders, which resulted in the involvement of 17 non-governmental organisations in a totality of 107 organisations. This selection of stakeholders was unfortunately carried out without any transparency on the eligibility requirements. Due to this practice, we fear that the final assessment of this consultation might be endangered by one-sided inputs and an overweight in industry's opinions.

In addition, the public surveillance of this consultation is strongly restricted by not publishing the answers of each stakeholder to the public. The general good practice of the European Commission to publish all inputs to stakeholder's consultations should be also applied for this consultation by DG Sante due to its potential influence on the EU-legislation.



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Leaving the final assessment to the same officials that effected the choice of stakeholders raises our strong concerns about the general transparency and democratic design of this consultation. We would also appreciate to learn on which legal basis DG Sante applies an exemption not to publish the input from stakeholders?

Aside from our concerns on a democratic and transparent practice in this stakeholder consultation, we would like to critically notice that the presentation of this study in the context of the Farm-to-Fork strategy is not in line with the mandate given by Member States.

This study is treating the practical implementation of new genomic techniques, which is not congruent with the objective of increasing sustainability along the food supply chain or reducing the dependency on pesticides, as described in the strategy.

Overall, we therefore request DG Sante to provide a transparent choice of representatives in stakeholder consultations with a profound focus on balance of interests among them, as well as the immediate publication of all stakeholders' inputs by the European Commission.

We are looking forward to your response.

Yours sincerely,



Martin Häusling, MEP