

Position Paper on the Approval of Genetically Modified Crops in the EU

Key Messages

- **Sustained imports of protein-rich GM crops are central for the EU feed value chain. Delays in the authorisation process may result in trade disruptions and uncertainty for value chain operators.**
- **GM crops have a long history of safe use. To be authorised on the EU market they undergo strict assessment by EFSA on any possible risks posed to human and animal health, as well as to the environment.**
- **CropLife Europe calls for an efficient and timely authorisation process for the import of GM crops into the EU, respecting legally foreseen deadlines.**

Context

Genetically modified (GM) crops have been increasingly cultivated and consumed worldwide for the past 25 years. In 2020, 190.5 million hectares of commercially approved GM crops were planted globally, a surface area that is larger than that taken by all EU arable land.¹

For political reasons, GM crops do not get authorised for cultivation in the EU, even if their safety has been repeatedly proven.² Cultivation of GM crops therefore takes place mostly outside Europe. In the EU market, imported GM crops are almost exclusively used for feed in the livestock industry, where access to protein crops is a key part of the sector's competitiveness.

GM crops are needed in the EU feed value chain

GM imports are essential for the balance of the EU feed market. The EU is 70% import-dependent on protein rich crops, most of which are GMOs.³ Despite the current ambition to boost plant protein production in the EU, this scenario will not advance quickly, and would not be sufficient to remove the need for imports. EU protein crops imports are expected to grow by 22% to sustain demand in 2020/21 alone.⁴

Soybean, maize, and rapeseed are the most important crops used as feed for livestock. EU import dependency is particularly high for soybeans used in feed, with EU soya production covering less than 3% of its needs.⁵ Similarly, in the 2019/20 marketing year, over a quarter of the maize used for feed in the EU was of non-EU origin, and over a quarter of the rapeseed used in the production of rapeseed meal was imported.⁶

A large share of these imported commodities can be assumed to be GM.⁷ Delays and uncertainty in the authorisation process of GM products are costly for food and feed chain operators and are not justified on safety grounds.

¹ <https://gm.agbioinvestor.com/>

² Bt corn producing insecticide is the only product to have ever been approved for cultivation in the EU, in 1996, predating the current framework.

³ <https://fefac.eu/priorities/markets-trade/eu-protein-plan/>

⁴ https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/farming/documents/short-term-outlook-spring-2021_en_0.pdf

⁵ https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/farming/documents/eu-feed-protein-balance-sheet_2020-2021_en.pdf

⁶ https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/farming/documents/eu-uk-feed-protein-balance-sheet_2019-2020_en.pdf

⁷ According to the European Commission, nearly a third of EU's maize imports come from Brazil while over a third of EU imports of rapeseed comes from Canada. Both countries have high GM adoption rates - 95% of Canadian rapeseed is GM, as well as 87.9% of Brazilian maize. EU soymeal imports largely come from the United States, Brazil and Argentina, where GM adoption rate is over 90%.

GM crops imported into the EU market are safe, labelled, and traceable

GM food and feed products can only be authorised in the EU if they have undergone a rigorous safety assessment by the European Food Safety Authority (EFSA), which evaluates their impact on human and animal health, and environmental safety.

A positive scientific opinion from EFSA is the basis upon which the EU's risk managers, i.e. the European Commission and EU Member States, decide on the authorisation of GMOs for the EU market. Once approved for import, the legislation also imposes post-market environmental monitoring for each authorised GMO.

In the EU, consumers have their freedom of choice guaranteed. The EU food labelling system obliges operators to indicate if the food or feed they produce contains GMOs.⁸ Companies also have the option to indicate on a label that their product does not contain GMOs.

Legal timelines must be respected to protect food and feed chain operators

The legal timelines foreseen in the GM authorisation process are rarely met. In fact, timelines continue to increase despite long-standing experience with GMOs and the absence of a single substantiated case of adverse effects on human and animal health, or on the environment.

In the EU, it takes on average almost 6 years from the time of submission until the final authorisation of a GM crop for import. Most delays occur during EFSA's risk assessment phase, which takes on average almost 5 years for new products. This timeframe is over four times longer than that taken by the European Medicines Agency to assess human medicines for marketing authorisation in the EU.⁹

That same process of GMO import authorisation takes on average less than one year in Australia and New Zealand, less than six months in Canada, and less than two years in the United States. All of these countries have stringent safety standards.

New biotech crops and traits continue to be developed in producing countries to help farmers face the challenges related to climate change, like the emergence of new pests and diseases. This reality requires importing countries to have an efficient and functional import authorisation system for new products.

Commodities such as soy, maize and rapeseed are globally traded with no separation between different varieties of the same crop. If traces are detected of a GM product that is authorised in the producing country but not yet authorised in the EU given the delays, the entire shipment is not allowed to enter.

The delays in product authorisation in the EU vis-à-vis other producing countries have therefore the potential to severely threaten trade flows. The overall cost to the European economy of such trade disruptions could total up to €9.6 billion per year according to a report published by the European Commission.¹⁰

How can the GM import authorisation processes be improved?

EFSA's risk assessment should be modernised, with a view to bringing timelines closer to the legally foreseen six months. This requires a more structured process, adopting clear, workable, and science-based guidance documents, and a case-by-case approach to risk assessment taking into account the experience gained.

Once products have received a positive opinion from EFSA regarding their safety, the European Commission should adopt a transparent process that adheres to the timelines foreseen by the legislation. Practical steps in this direction include:

- Timely voting of products in the Standing and Appeal Committees following the published calendar;
- Granting the approval of products shortly after their vote;
- Establishing regular dialogue between applicants and EFSA.

For Member States, and the public at large, trusting EFSA's scientific advice is crucial. Failing to support the EU's own best science is the single most damaging element for growth, innovation, investment as well as consumer confidence and safety. A favourable, pro-science stance towards the approval process would render outcomes more predictable and coherent. GM imports play, and will continue to play for many years to come, a key role in the EU feed market.

⁸ This applies when GMOs account for at least 0.9% of the food or the feed.

⁹ https://www.ema.europa.eu/en/documents/annual-report/2020-annual-report-european-medicines-agency_en.pdf

¹⁰ <https://op.europa.eu/en/publication-detail/-/publication/2dba2ffd-a55c-4f83-b391-c63257fd598d>