



Brussels, 10 June 2026

Open letter: EU Proposal on the Deliberate Release of Genetically Modified Microorganisms

Dear Minister,

We are writing to express our serious concerns regarding the European Commission's legislative proposal to amend Directive 2001/18/EC with the aim of accelerating market access for genetically modified microorganisms (GMMs)¹.

The proposal would significantly weaken the EU's safety standards governing the deliberate release of genetically modified microorganisms (GMMs) into open environments. In its current form, it is insufficiently supported by scientific evidence and incompatible with the European precautionary principle.

We therefore call on your government to take a firm position against the proposal in its current form.

The European Coordination Via Campesina (ECVC) represents small-scale peasant farmers and agricultural workers. Peasant farmers play a key role in the management of microorganisms, which in turn play an essential role in ecosystems, soil fertility, biogeochemical cycles, the health of humans and animals, and food processing. They often reproduce rapidly, evolve quickly, and exchange genetic material across species boundaries. Currently, there is no exhaustive monitoring of the evolution and interactions between microorganisms and with other living organisms. The proposal seeks to facilitate the marketing of GMMs used in fertilizers, pesticides, veterinary products, products used in food processing, etc. A large proportion of the microorganisms covered by the proposal – including bacteria, viruses, fungi, and algae – as well as their ecological interactions, remain poorly understood and far from adequately researched.

The deliberate release of GMMs could have far-reaching and potentially irreversible consequences extending well beyond their intended functions. Essential processes within plant, animal, and human microbiomes may be disrupted. Critical soil and agricultural ecosystems functions could also be destabilized, potentially affecting ecosystem resilience and climate adaptation. **Once released, GMMs cannot be effectively controlled or recalled. Their release should therefore be subject to the utmost caution and should not be authorized where significant scientific uncertainties remain.**

Against this background, we consider it unacceptable that the Commission wants to weaken risk assessment requirements for GMMs, remove the time limitation on EU authorizations, and, in certain cases, even dispense with post-market monitoring. Equally concerning is the

¹ COM(2025) 1031

proposal to relax, in certain circumstances, the requirements for analytical methods used to detect, identify, and quantify GMMs. Without reliable and accessible detection and identification methods, effective monitoring, traceability, risk management, and accountability are impossible. **How will we remove such GMMs from the environment if, after their release, they cause health or environmental damage which had not been previously identified?**

The release of GMMs could also have serious consequences for conventional and organic agriculture, as well as for beekeeping. The proposal fails to provide effective coexistence measures or liability provisions based on the polluter-pays principle. As a result, conventional and organic plant and animal breeding, farming, food production, and beekeeping could be exposed to significant contamination risks. **Furthermore, in the event of such contamination, the proposal does not provide for any measures to protect farmers and other agri-food operators from abusive legal action in case of accidental and unintentional use of GMMs, which are also covered by patents.**

Given the limited scientific understanding of microbial ecology, the potentially serious risks involved, and the possible impacts on conventional and organic food production, we urge your government to advocate for a rejection of the proposal.

The revision of the current regulation must ensure that GMMs may only be released into open environments following a comprehensive, case-by-case risk assessment. It must allow their removal not only from the market but also from the environment, in case of serious post-release damage. Any authorization should be conditional upon the implementation of appropriate risk management measures, reliable detectability, long-term monitoring, effective coexistence measures, and realistic emergency response and remediation plans. Where these conditions cannot be met, no release should be permitted. Furthermore, EU authorizations should be subject to regular review in light of new scientific evidence and monitoring results.

We would welcome the opportunity to discuss our concerns with you in greater detail at a future meeting.

Yours sincerely,

Alessandra Turco and Jean Thévenot

Members of European Coordination Via Campesina's Coordinating Committee

The European Coordination Via Campesina (ECVC) is a confederation of unions and organisations of peasant farmers, small and medium-scale farmers, and agricultural workers across Europe. We are currently composed of 28 national and regional peasant farmer organisations from 20 European countries.