

Commissioner Vytenis Andriukaitis  
Rue de la Loi 200  
1049 Brussels  
Belgium

**CC:**

- Vice-President Timmermans, Vice-President Katainen, Commissioner Malmström, Commissioner Hogan, Commissioner Bieńkowska, Commissioner Moedas
- Ms Nathalie Chaze, Mr Marco Valletta (Cabinet of Commissioner Andriukaitis)
- Mr Ladislav Miko, Ms Sabine Juelicher, Ms Chantal Bruetschy, Ms Sabine Pelsser (DG SANTE)
- EU Ombudsman

Brussels, 26 April 2016

**Re: Delays in GMO import approvals**

Dear Commissioner,

The EU Food and Feed Chain (FFC) partners<sup>1</sup> are deeply concerned about the new delays in the European Commission's decision-making process regarding the authorisation of Genetically Modified Organisms (GMOs) for food, feed and imports, as well as the potential effects of these delays on the EU agri-food chain.

Three GM soybean events<sup>2</sup> have been pending approval for three and a half months since the Appeal Committee vote took place on 11 January 2016. These delays in the application of EU rules are leading to a situation of uncertainty for EU operators along the agri-food chain. Unless brought to an end, they risk to severely disrupt international trade in, and therefore availability and prices of, agricultural commodities for animal feeding purposes in the EU. In fact, these delays are already disrupting North American seed markets, as many farmers are unsure whether they will be able to export the GM soybeans that they must already start planting.

The EU FFC coalition continues to firmly stand by the principles enshrined in its May 2015 Position Paper calling for a functioning evidence-based EU policy on GMOs.<sup>3</sup> The FFC partners consider that such a GMO policy in the EU is crucial for a competitive and sustainable Europe and believe that, to that end, the existing EU legislation must be applied in a correct and timely manner to ensure legal and regulatory certainty for all operators. In addition, these delays come one year after the end of the Commission's de facto moratorium on the authorisation of GMOs, which resulted in findings from the EU Ombudsman that the Commission incurred maladministration between 2012 and 2014 when handling authorisation applications of GM food and feed for import and processing in the EU.<sup>4</sup>

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<sup>1</sup> The EU Food and Feed Chain (FFC) coalition brings together the relevant EU stakeholders in the area of production, trade and use of agricultural products whose members are directly impacted by EU policies related to GMOs.

<sup>2</sup> MON87705 x MON89788, MON87708 x MON89788 and FG72.

<sup>3</sup> [http://www.coceral.com/data/1432823849EU\\_Food\\_Feed\\_Chain\\_overarching\\_position\\_paper\\_Final\\_May\\_2015.pdf](http://www.coceral.com/data/1432823849EU_Food_Feed_Chain_overarching_position_paper_Final_May_2015.pdf)

<sup>4</sup> Ombudsman Decision 1582/2014/PHP.

Based on the above, the EU Food and Feed Chain coalition respectfully calls on the Commission to complete the authorisation process for the three pending GM soybeans as a matter of urgency given the time already lapsed since the Appeal Committee vote and the impact of any further delay in the current circumstances. The EU food and feed partners deem a correct application of the existing legislation on GMO approvals essential to secure a smooth functioning of markets, trade and supply of commodities in the EU.

Yours sincerely,

**Cees Vermeeren**  
Secretary General  
a.v.e.c

**Teresa Babuscio**  
Secretary General  
COCERAL and Unistock Europe

**Pekka Pesonen**  
Secretary General  
Copa-Cogeca

**Garlich von Essen**  
Secretary General  
ESA

**Nathalie Moll**  
Secretary General  
EuropaBio

**Laurent Reverdy**  
Secretary General  
European Flour Millers

**Susanne Meyer**  
Secretary General  
EUVEPRO

**Nathalie Lecocq**  
Director General  
FEDIOL

**Alexander Döring**  
Secretary General  
FEFAC


**Chris Downes**  
Secretary General  
FERM

**Jamie Fortescue**  
Managing Director  
Starch Europe

**Jean-Luc Mériaux**  
Secretary General  
UECBV

**Mella Frewen**  
Director General  
FoodDrinkEurope

	<p><b>a.v.e.c.</b> is since 1966 representing and promoting the interests of the European poultry meat sector. Members are national organisations representing poultry processors and the poultry trade in 16 EU countries with about 95% of the EU poultry meat production. The European poultry meat business employs more than 300,000 citizens and has a turnover of more than 32 billion Euros.</p>
	<p><b>COCERAL</b> is the European association of trade in cereals, rice, feedstuffs oilseeds, olive oil, oils and fats and agrosupply. It represents the interest of the European collectors, traders, importers, exporters and port silo storekeepers of the above mentioned agricultural products. COCERAL's full members are 26 national associations in 18 countries and 1 European association [Unistock]. With about 3500 companies as part of COCERAL national members, the sector trades agricultural raw materials destined to the supply of the food and feed chains, as well as for technical and energy uses. COCERAL has two associated members in Switzerland and Serbia and one extraordinary member Gafta.</p>
	<p><b>COPA-COGECA</b> is the united voice of farmers and agri-cooperatives in the EU. Together, they ensure that EU agriculture is sustainable, innovative and competitive, guaranteeing food security to half a billion people throughout Europe. Copa represents over 23 million farmers and their families whilst Cogeca represents the interests of 22,000 agricultural cooperatives. They have 66 member organisations from the EU member states.</p>
	<p><b>ESA</b> European Seed Association is the voice of the European seed sector, representing those active in research, breeding, production and marketing of seeds. Its membership consists of more 36 national seed associations, representing more than 7000 seed businesses, and of more than 60 individual company members.</p>
	<p><b>EuropaBio</b> is the European Association of BioIndustries. Our members are involved in research, development, testing, manufacturing and commercialisation of biotech products and processes in human and animal healthcare, diagnostics, bioinformatics, chemicals, crop protection, agriculture, food and environmental products and services. EuropaBio also counts a number of National Biotech Associations in its membership who in turn represent more than 1800 biotech SMEs.</p>
	<p><b>European Flour Millers'</b> association is the voice of the European flour milling industry. It gathers the national associations from 28 European countries. They represent 3,800 companies employing some 45 000 people. With some 45 million tonnes of agricultural commodities processed in the EU each year, the sector is the largest single food user of EU domestic wheat, rye and oats.</p>
	<p><b>EUVEPRO</b> is the European Vegetable Protein Federation representing the interest of the producers of vegetable proteins for human consumption in the EU.</p>
	<p><b>FEDIOL</b> the EU vegetable oil and proteinmeal industry association, represents the interests of the European seed and bean crushers, meal producers, vegetable oils producers, refiners and bottlers. FEDIOL's members are 12 national associations and associated company members in 5 other EU countries. With about 150 facilities in Europe the sector provides 20,000 direct employments. Its members process approximately 36 million tonnes of basic products a year, both of EU origin and imported from third country markets.</p>
	<p><b>FEFAC</b> is the European Compound Feed Manufacturers' Federation. FEFAC represents 24 national Associations in 23 EU Member States as well as Associations in Switzerland, Turkey, Croatia, Serbia, Russia and Norway with observer/associate member status, and is the only independent spokesman of the European Compound Feed Industry at the level of the European Institutions. The European compound feed industry employs over 110,000 persons on app. 4,000 production sites often in rural areas, which offer few employment opportunities.</p>
	<p><b>The Federation of European Rice Millers</b> is the voice of the European rice milling industry. FERM is made up of 21 company members from around Europe as well as 3 national rice milling associations of Italy, Spain and Portugal. In representing over 90% of the milling capacity in Europe it is able to reflect credibly and authoritatively the interests of the industry.</p>

	<p><b>FoodDrinkEurope</b> represents the European food and drink industry, the largest manufacturing sector in the EU in terms of turnover and employment. It aims to promote the industry's interests to European and international institutions, contributing to a framework addressing, inter alia, food safety and science, nutrition and health, environmental sustainability and competitiveness.</p>
	<p><b>Starch Europe</b> is the trade association which represents the interests of the EU starch industry both at European and international level. Its membership comprises 24 EU starch producing companies, together representing more than 95% of the EU starch industry, and in associate membership, 7 national starch industry associations. Before October 2014 Starch Europe was called the AAF.</p>
	<p><b>The European Livestock and Meat Trades Union (UECBV)</b> represents national federations of livestock traders, meat industry, and meat traders. Through its 52 national member federations, UECBV is the voice for some 20,000 trading and industrial companies.</p>
	<p><b>Unistock Europe</b> is the only European association of professional storekeepers for agribulk commodities in the European Union. Unistock Europe full members are present in 11 countries. With a total of approximately 79 port silos facilities Unistock Europe proactively represents the united voice for the agribulk storage sector towards the EU authorities. Unistock Europe is a full member of COCERAL.</p>