The full list of signatories, including national organisations, is at the end of the document.

Brussels, 16 November 2026

Open Letter: the legislative proposal on genetically modified micro-organisms is a serious threat to agriculture, health and the environment. 50 organisations demand its rejection

Dear Members of the European Parliament,

On the 25 November, the European Parliament will have to vote on the legislative proposal on genetically modified micro-organisms (GMMs). GMMs can be very diverse micro-organisms (viruses, bacteria, fungi, algae, etc.), which have been genetically modified. They are currently regulated as GMOs under Directive 2001/18/EC for their release in open environments, and under Directive 2009/41/EC for their use in confined environment.

This legislative proposal plans to directly amend Directive 2001/18/CE to weaken the requirements applying to GMMs: firstly, it proposes to create a new category of "low-risk GMMs", with weaker or non-existent environmental and health risk assessment and environmental monitoring requirements (in the absence of detection and identification methods, which have been made optional). Secondly, it foresees the unlimited authorisation of all GMMs, with no requirement for periodic reassessments in light of the latest scientific knowledge and most recent experiences. Finally, it does not include any provision to prohibit the abusive extension of the scope of patents covering these GMMs in case of contaminations, against which farmers and other agri-food operators will have no means of protection.

On behalf of the 50 signatories representing farmers, the organic and biodynamic sector, seed networks, seed companies and plant breeders, civil society organisations and grassroots movements, we express our deep concern with this legislative proposal: it completely ignores the precautionary principle, although it is enshrined in the European Treaties. So far, living GMMs have never been authorized in the EU for marketing and dissemination in open environments[1]. Once released into the environment, GMMs can rapidly multiply, recombine and exchange genes or genetic information with other microorganisms and organisms. This enables them to spread very quickly across ecosystems. The potential damage this could cause to agricultural systems, wild ecosystems and human and animal health will be uncontrollable, as it will be impossible to measure the impacts or remove these GMMs from the environment once they have been released.

Scientific experts are raising the alarm

Current scientific knowledge on micro-organisms remains very limited: 99% of micro-organisms, which are the basis of life on earth, and over 90 per cent of soil microorganisms, which make agriculture possible, remain completely unknown. So do their interactions and their genetic and epigenetic evolutions, which occur much more rapidly (in a few hours or days) than they do in plants, animals and other organisms. The release of GMMs into the environment without a strict case-by-case risk assessment and analytical traceability (detection and identification methods) can by no means be

[1] GMMs are already widely used in the food and pharmaceutical industries, but only in contained environments, in accordance with Directive 2009/41/EC.

justified. These requirements, as provided in the current legislation, are essential in order to limit their dissemination, in the event of damages appearing after their release.

We are especially preoccupied to see that, in spite of these important concerns on safety, **the European Commission has published this legislative proposal without conducting a prior impact assessment.** This was pointed out in a recent opinion published by a collective of 62 French researchers, who are calling on European policy-makers to properly evaluate the impact of this legislative proposal before approving it. A recent expert opinion issued by the German Agency for Nature Conservation (BfN) also estimates that this legislative proposal may lead to a reduction in the level of protection of the environment, and clearly recommends, instead of "*pursuing extensive deregulation without sufficient empirical foundations,* [to] *focus on further specifying and harmonising enforcement practice within the existing legal framework"*.

Patented GMMs: a new threat for farmers and agri-food operators

Farmers are extremely concerned because they depend on soil micro-organisms for food production. The impacts on agri-food system could be absolutely catastrophic, especially when we know that there are several applications of GMMs for agriculture, in particular, GMMs-based pesticides, fertilizers or products used for animal health or food processing.

Moreover, GMMs are GMOs: they therefore remain banned in conventional GM-free and organic agri-food production, but **the proposal to weaken requirements for detection methods and monitoring will make coexistence impossible**. Moreover, even though the legislative proposal does not formally change the requirement to label GMMs, **the reliability of labelling will not be guaranteed if the publication of detection and identification methods is no longer mandatory**. Labelling also applies only to products that contain GMMs, and not to agricultural and food products produced with GMMs (fertilizers, biopesticides, processing additives). Consumers will therefore have no way to choose GMO-free products. This is all the more concerning given that GMMs used in agriculture and food processing can recombine with microorganisms in the soil, agricultural products, and processed foods, and subsequently with the millions of microorganisms that, in farm animals and human bodies, ensure digestion and the proper functioning of the immune system. We know nothing about the potential harmful consequences of such recombination, which we will not be able to identify or trace.

Finally, **patents on GMMs have been on the rise in the last years**, even though there are still few products authorized on the market. However, we can already see a trend of concentration of these patents by a few companies[2]. What will be the consequences if GMMs are released in open environments? **This legislative proposal contains no provisions to prohibit the abusive extension of the scope of patents covering these GMMs** in case of accidental contamination, nor does it prohibit patents covering microorganisms of a given family containing a specific genetic sequence, including those which are not derived from the patented process.

Today, what we demand to the European Parliament is to maintain safety standards for these GMMs, instead of leaning in to the simplification narrative. GMMs are not banned in the EU: they can be authorised through the current GMO legislation, which guarantees high safety standards (risk assessment, analytical traceability, labelling and monitoring) for human health and for agri-food systems.

[2] According to the World Intellectual property organisation (WIPO) PATENTSCOPE database, patent applications published between 2015 and September 2026 concerning microorganisms modified for agricultural applications cover 104 patent families. Three companies (Pivot Bio (USA), BioConsortia (USA), and Bayer (DE)) hold 63 of these, or 61% of the patents.

On behalf of the signatories, we ask you to not support this dangerous legislative proposal in the upcoming plenary vote. In light of the risks associated with the dissemination of GMMs in the environment, the amendments that were introduced to improve the proposal are insufficient. On November 10, the proposal was supported by a majority of MEPs of the Public health and Environment Committees, with the adoption of amendments that strengthen certain requirements, but fail to challenge the deregulation in itself.

For the upcoming plenary vote, we ask you to prioritize safety and reject this proposal.

Sincerely,

List of signatories

International and European organisations

Biodynamic Federation Demeter International

Corporate Europe Observatory

European Consortium for Organic Plant Breeding

European Coordination Via Campesina

IFOAM Organics Europe

National organisations, entities and companies

AEGILOPS

Amis de la Terre Landes

Amrita Soc. Coop. Agricola

Arbeitsgemeinschaft bäuerliche LAndwirtschaft (AbL) e.V.

Aspro pnpp

Association 1001 Légumes

Bund für Umwelt und Naturschutz (BUND)

Centro Internazionale Crocevia

Centre for Sustainable Alternatives (CEPTA)

Demeter France

Ekō

Escola Superior Agrária - Universidade Politécnica de Coimbra

Extnction Rebellion, Campagne Changement de Régime

Fédération Nature et Progrès

Fédération Unie de Groupements d'Eleveurs et d'Agriculteurs (FUGEA)

Federazione Nazionale Pro Natura

Getreidezüchtung Peter Kunz, gzpk

GM Freeze

GMWatch

Greenpeace Italy

Kokopelli

Landsforeningen for Økosamfund

Landsforeningen Praktisk Økologi

Li Mestère ASBL

Mètis

Miljøbevægelsen NOAH

Mouvement d'Action Paysanne (MAP-EPI)

Mouvement de l'Agriculture Biodynamique (MABD)

Nature & Progrès

Nordic Maize breeding

OGM dangers

ÖMKi - Research Institute of Organic Agriculture, Hungary

Organic Youth Denmark

POLLINIS

Quid est VERITAS

Réseau Semences Paysannes

Save Our Seeds

Schweizer Allianz Gentechfrei

Slovensko bez GMO

Syndicat SIMPLES

Vereenegung fir Biolandwirtschaft Lëtzebuerg asbl.

Vidiecky parlament na Slovensku