



Mr Frans Timmermans  
Executive Vice-President for the European Green Deal

Mr Valdis Dombrovskis  
Executive Vice-President for an Economy that Works for People

Mr Maroš Šefčovič  
Vice-President for Interinstitutional Relations and Foresight

Mr Michel Barnier  
Special Adviser to the President of the European Commission

*Copy to:*  
Mr Charles Michel, President of the European Council  
Mr David Sassoli, President of the European Parliament

*By electronic mail*

15 March 2021

**Re: UK deregulation of certain forms of genetic modification**

Dear Executive Vice-Presidents, Dear Vice-President, Dear Mr Barnier,

We are writing to state our concern about a potential breach of the EU-UK Trade and Cooperation Agreement (TCA), which we believe merits your closest attention.

On 7 January, only days after the EU-UK TCA came provisionally into force, the UK government announced that it intends to exclude certain genetically modified organisms (GMOs) engineered with so-called gene editing techniques (e.g. CRISPR/Cas) from its GMO regulations.

These GMOs are covered by the EU GMO Directive, according to a landmark ruling of the European Court of Justice (ECJ) of July 2018. According to the Court, their exclusion would reduce the scope of the directive in a way that “would compromise the objective of protection pursued by the directive and would fail to respect the precautionary principle which it seeks to implement” (para 53 of the ruling).

The UK government said very openly that it aimed to stop “certain gene editing organisms from being regulated in the same way as genetic modification”. It explicitly mentioned the 2018 ECJ ruling that it intends to overturn, and emphasised that it is now “free” to make its own policy decisions.

If the UK government goes ahead with these plans, which include both gene edited plants and animals, this will clearly weaken its health, environmental and animal welfare standards, compared to those of the EU. It will constitute a clear breach of the TCA’s principle of non-regression, which should be dealt with in accordance with the non-regression clause of the agreement.

We are asking you to signal this very clearly to your UK counterpart, and to call on the UK government to drop its plans or face the consequences concerning future trade in agricultural goods between the EU and the UK.

We remain at your disposal for any further information you may require.

Yours sincerely,

Jorgo Riss,  
Executive Director, Greenpeace European Unit

Also on behalf of:

Beyond GM  
Corporate Europe Observatory  
Compassion in World Farming  
Ecoropa  
ETC Group  
Eurogroup for Animals  
European Coordination Via Campesina  
Friends of the Earth Europe  
GM Freeze  
GMWatch  
IFOAM Organics Europe  
Save Our Seeds  
Slow Food Europe