June 16th, 2020

Dear Executive Vice-President Timmermans,

We are writing to you, in your role as Executive Vice-President for the European Green Deal, regarding the pending authorisation of GM Soybean MON 87708 × MON 89788 × A5547-127. As you will be aware, the European Parliament strongly rejected the Commission's proposal to authorise it, with a resolution adopted on 14 May 2020[1].

The reasons for Parliament's objection can briefly summarised as; health risks due to gaps in the risk assessment process; concerns around the undermining of the SDGs and the international climate and biodiversity targets that the EU has committed to, and the lack of democratic legitimacy of the decision making process.

The resolution welcomes that the Commission intends for the European Green Deal to be an integral part of the Commission's strategy to implement the UN's 2030 Agenda and the SDGs. We also welcome that the more recently published Farm to Fork Strategy aims to ensure that the food chain has a neutral or positive environmental impact, while upholding standards of safety and quality.

We believe that these promises and commitments will be severely undermined if this GM soybean is authorised for import.

Undemocratic decision-making

The resolution adopted on 14 May 2020 represents the 43rd objection to GM food and feed import authorisations that the Parliament has adopted since December 2015. The European Commission has gone ahead with the authorisation of 42 of these GMOs. This is despite our objections and despite there never being a qualified majority of Member States in favour of authorisation

This 43rd objection, against GM soybean MON 87708 × MON 89788 × A5547-127, received the highest ever number of MEPs in favour (477), while only 10 Member States, representing only 37% of the EU population, voted in favour of authorisation at appeals committee stage.

You will no doubt be aware that this GM authorisation is the first GMO import application that the new Commission will have to take a decision on. We take this opportunity to urge you to reject the authorisation, as per the demand of the Parliament, which the Commission is legally entitled to do.

This would simply be honouring the promised outlined in the European Green Deal, as well as the Farm to Farm Strategy, amongst others, putting the climate, biodiversity, health and attainment of the SDGs first.

Health risks

GM Soybean MON 87708 × MON 89788 × A5547-127 has been engineered to be tolerant to the herbicides glyphosate, glufosinate and dicamba. Questions around the carcinogenicity of glyphosate remain and glufosinate is classified as toxic for reproduction with its use is no longer authorised in

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[1] https://www.europarl.europa.eu/doceo/document/TA-9-2020-0069_EN.html

the EU.   A scientific study published in May 2020 found that use of dicamba can increase the risk of developing liver and intrahepatic bile duct cancers[2].

Among other gaps, the cumulative effects of these herbicide residues on imports of GM soybean MON 87708 × MON 89788 × A5547-127 have not been analysed as part of EFA's risk assessment.

Deforestation associated with GM soybeans

The global soya trade is a major source of greenhouse gas emissions. Soya production is a key driver of deforestation in the Amazon, Cerrado and Gran Chaco forests in South America and 97 % and 100 % of soya cultivated respectively in Brazil and Argentina is GM soya[3]. As you know, deforestation is a major cause of biodiversity decline and emissions from land-use and land-use change, mostly due to deforestation, are the second biggest cause of climate change after burning fossil fuels[4].

A recent peer-reviewed scientific study, by a coalition of pan-EU researchers, found that the EU is the region with the largest carbon footprint in the world associated with soy imports from Brazil, 13.8% larger than that of China, the largest soy importer, due to a larger share of emissions from embodied deforestation[5].

According to the Commission itself, soya has historically been the Union's number one contributor to global deforestation and related emissions, accounting for nearly half of the deforestation embodied in all Union imports[6]. The majority of imported soya is used for animal feed.

In this context, the Parliament's resolution outlines how both SDG 15.20 (halting deforestation) and SDG 3.9 (aiming to substantially reduce the number of deaths and illnesses from hazardous chemicals) could be undermined by the authorisation of this GM soybean. It is also the case that forests play a multi-functional role that support the achievement of most SDGs[7].

We urge you not to miss this opportunity to show Europe that the pledges outlined in the European Green Deal are not just empty words.

Yours sincerely,

MEP   Tilly   Metz
MEP   Eleonora   Evi

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[2] Catherine C Lerro, Jonathan N Hofmann, Gabriella Andreotti, Stella Koutros, Christine G Parks, Aaron Blair, Paul S Albert, Jay H Lubin, Dale P Sandler, Laura E Beane Freeman, Dicamba use and cancer incidence in the agricultural health study: an updated analysis, *International Journal of Epidemiology*, , dyaa066, https://doi.org/10.1093/ije/dyaa066

[3] International Service for the Acquisition of Agri-biotech Applications, 'Global status of commercialized biotech/GM crops in 2017: Biotech Crop Adoption Surges as Economic Benefits Accumulate in 22 Years', ISAAA Brief No. 53 (2017), pp. 16 and 21,

[4] Communication of the Commission of 23 July 2019, 'Stepping up EU action to Protect and Restore the World's forests', COM(2019)0352, p. 1.

[5] Escobar, N., Tizado, E. J., zu Ermgassen, E. K., Löfgren, P., Börner, J., & Godar, J. (2020). Spatially-explicit footprints of agricultural commodities: Mapping carbon emissions embodied in Brazil's soy exports. Global Environmental Change, 62, 102067 https://www.sciencedirect.com/science/article/pii/S0959378019308623

[6] Technical Report - 2013 - 063 of the Commission, 'The impact of EU consumption on deforestation: Comprehensive analysis of the impact of EU consumption on deforestation', study funded by the European Commission, DG ENV, and undertaken by VITO, IIASA, HIVA and IUCN NL, http://ec.europa.eu/environment/forests/pdf/1.%20Report%20analysis%20of%20impact.pdf, pp. 23-24.

[7] Communication of the Commission of 23 July 2019, 'Stepping up EU action to Protect and Restore the World's forests', COM(2019)0352, p. 2.

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MEP	Sirpa	Pietikaïnen
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