

Agriculture and food production without genetic engineering at risk

Berlin, 9 January 2024

Dear Mr Weber,

We are reaching out to you as representatives of leading businesses in the food industry in Germany and beyond.

We are very concerned about the law currently being discussed by the European Parliament and the Council of Agriculture Ministers to regulate new genomic techniques (NGT). The current draft legislation on NGT will determine whether there will be agriculture and food production without genetic engineering in the EU in the future.

As businesses in the food sector, we know that many consumers are skeptical about genetically modified products and want to decide for themselves whether they want to buy and eat them. We want to continue to be able to produce and offer products without the use of genetic engineering. In 2022, 16 billion euros were generated in Germany alone with conventional food labelled "Ohne Gentechnik" (Non-GMO) and 15.3 billion euros in the Organic sector.

Competition thrives on differentiation. The market segment for food produced without GMO should continue to exist in the interest of a diverse range of products and our customers.

Biodiversity in nature and agriculture is a central component of sustainability and thus of the Green Deal's farm-to-fork strategy. This requires that there will continue to be agricultural areas without GMO in the future.

The European People's Party, which you lead, has a key role to play in the negotiations on legislation on new genetic engineering. It is the largest political group in the European Parliament and appoints the rapporteur in the responsible Environment Committee. It depends on the EPP whether transparency and freedom of choice will continue to apply to new genetic engineering products for Europe's consumers and economic operators in the future and whether EU organic farming can continue to operate without GMO, in line with the global consensus.

We are therefore very concerned that the EPP wants to enforce legal regulations that would result in 94 percent of all products produced with new genetic engineering (category 1 NGTs) remaining unlabelled and thus not being recognisable as such on the market. Your group goes even beyond the EU Commission. While its legislative proposal at least provides for the labelling of genetically modified seeds, the EPP rapporteur's draft removes even this minimum requirement for transparency - and thus the basis for the traceability and labelling of genetically modified products. While the EU Commission's draft explicitly stipulates the exclusion of category 1 NGTs in organic farming, the EPP wants to lift this ban. In doing so, it is opposing the will of the entire European Organic sector.

Hundreds of thousands of businesses in both the Organic sector and the conventional "Ohne Gentechnik" sector have invested in functioning value chains over the last decades on the basis of the EU Organic Regulation and national "Ohne Gentechnik" legislation and have built up markets worth billions. These businesses are jeopardised if they can no longer reliably keep NGT

products out of their value chains. Consumers rightly expect that products produced organically and "Ohne Gentechnik" do not contain genetic engineering.

We therefore urge you and your parliamentary group to revise your current position.

We ask you to respect our entrepreneurial freedom to produce and sell products without GMO and to support the legal requirements that we need in order to remain capable of acting: Traceability, labelling for all NGTs and for EU-wide binding coexistence rules for agriculture and food production with and without GMO.

We ask you to acknowledge products without GMO as an important competitive advantage of European agriculture and food production both on the domestic EU market and on world markets.

We ask you not to jeopardise successful markets worth billions that have been created by farmers and businesses in the food industry.

We are at your disposal for an appointment.

Kind regards

Initial signatories

Felix Ahlers, Chairman of the Executive Board, FRoSTA AG

Kerstin Erbe, Managing Director Product Management, dm-drogerie markt GmbH + Co. KG

Irmgard Freidler, Managing Director, ALB-GOLD Teigwaren GmbH

Prof Dr Götz E. Rehn, Founder and Managing Director, Alnatura Produktions- und Handels GmbH

Barbara Scheitz, Managing Director, Andechser Molkerei Scheitz GmbH



Further signatories (status: 5 February 2024)

A. Saumweber GmbH	Bio-Backhaus-Wüst GmbH	C.F. Grell Nachf. Naturkost GmbH & Co. KG
A.R.T. Services GmbH	BioBreadness GmbH	Ceralia Getreideprodukte GmbH
Agrano GmbH & Co.KG	Biofleisch NRW eG	Conrad Schulte GmbH & Co. KG
Agrar GbR Tanna	Biogarten Handels GmbH	D+L Lehnertz GmbH Eifel-Eier + Eiprodukte
AGRO FOOD Lebensmittel GmbH	BIOGEMÜSE Kemper GmbH	D'Angelo Pasta GmbH
Allos Hof-Manufaktur GmbH	BioGourmet GmbH	DAS VOGLHAUS CAFÉ UND KAUFHAUS, Einzelfirma
Alois Lachner, Food Ingredients & Consulting	Bio-Gut Rosenthal GmbH & Co. KG	Demeter Getreide Chiemgau GmbH
Altdorfer Biofleisch GmbH	Biohof Ottilie & Ottilie Hofcafé	Demeter Landbauerzeugnisse GmbH
Anderlbauer e.K.	BioHof Wöhler	Demeter-Felderzeugnisse GmbH
ARCHE Naturprodukte GmbH	Biolandhof Hager-Plate	Denningers Mühlenbäckerei, Einzelunternehmen
Arpshof Landbauforschung GmbH	Biolandhof Steidle	Der Leyenhof - Vicky Jacobs Einzelunternehmung
Authentico. Bioland Imkerei	Biomarkt Hauser OHG	Detmers Getreide-Vollwertkost GmbH
Back Bord Mühlenbäckerei GmbH & Co. KG	Biomichl OHG	DFM Vermarktungs GmbH
Bäckerei Heiglbeck	Biomüse UG (haftungsbeschränkt)	Die Biohennen AG
Backstüble Zuck & Kaun GmbH	Bios Naturmarkt Göggingen e. Kfm.	Die Nudelwerkstatt Magdeburg
barischda - Benedict Buergin	BioTrio GmbH	Dorfkäserei Geifertshofen AG
Bauck GmbH	Biovum GmbH	Dorfladen Frauenzell Einzelunternehmen
Bäuerliche Erzeugergemeinschaft Schwäbisch Hall AG	Bischoff und Bremer Vermarktung Gbr	dreher bio gmbh
beckers bester GmbH	blattfrisch GmbH	Dünninger GbR
Berisia & Beer GmbH & Co. KG	Bohlsener Mühle GmbH & Co. KG	eco united GmbH
Bio Bäckerei Polz	Boßhammersch Hof GmbH & Co. KG	Egesun GmbH
Bio Bäckerei Postler GmbH	Brauerei "Pinkus" Müller GmbH & Co. KG	Ehmann HagenauerHof KG
Bio Gut Rosenthal GmbH & CO KG	Brauerei Clemens Härle KG	erasmus bio fine dining, Einzelunternehmen
Bio Konditorei Tillmann GmbH	brem organics GmbH	Erzeugerschlachthof Kurhessen AG
Bio-Bäckerei Vogel	Brot- und Feinbäckerei Erbach	Etelser Käsewerk GmbH
BioBackHaus Leib GmbH	Brotgarten GmbH und Co. KG	
BioBackHaus Stumpf GbR	Brotique	
	Burkhardt Feinkostwerke GmbH	
	Byodo Naturkost GmbH	

Fairfleisch GmbH	Hofladen und Bäckerei Wörme	Märkisches Landbrot GmbH
Fauser Vitaquellwerk KG (GmbH&Co)	Hügli Nahrungsmittel GmbH	Marold- Ökologischer Samenbau GmbH & Co. KG
Fleischerei Linnewedel Einzelunternehmen	HUOBER BREZEL GmbH & Co.	Martinshof GmbH
FoodArt GmbH	Il Cesto GmbH & Co.KG	MATSCH & BREI e.K.
foodie & friends - Dirk Siemenowski, Einzelunternehmen	Il Cesto Handels GmbH	Mein Backhaus Wegener
Fourveg Deutschland GmbH	ImkereiOffizin Ute Balleisen und Markus Daiser GbR	Metzgerei Allmendinger GmbH & Co. KG
Franken-Gemüse Bio eG	InnFood Organic GmbH	Milchwerke Berchtesgadener Land Chiemgau eG
Franky & Friends	Johann Monter Inh. Wolfgang Maffert	Minderleinsmühle GmbH & Co. KG
Franz Tress GmbH & Co. KG	Kaisermühle Gänheim Otmar Kaiser GmbH	MineralBrunnen RhönSprudel Egon Schindel GmbH
Fürstenwalder Agrarprodukte GmbH Buchholz	Kanne Brottrunk GmbH & Co. Betriebsgesellschaft KG	möhrengrün
GEPA The Fair Trade Company	Kiebitz e.V.	Molkerei Schrozberg - Molkereigenossenschaft Hohenlohe-Franken eG
Globus Markthallen Holding GmbH & Co. KG	Kleeschulte GmbH & Co. KG	mossa GmbH
Govinda Natur GmbH	Knuspr.de (Großer Kern GmbH)	Mühle Erks Inh. Uwe Erks e.K.
Green Goodies Food GmbH	Kohler-Kiste GbR	Naturata AG
Greenic GmbH	KORNKREIS Erzeugergemeinschaft GmbH	Naturland Zeichen GmbH
Hamfelder Hof Bauernmeierei GmbH & Co. KG	KoRo Handels GmbH	Neuland Fleischvertriebs GmbH
Hammermühle GmbH	Landhandel Nord-West GmbH&Co. KG	Neumarkter Lammsbräu Gebr. Ehrnsperger KG
hanf&natur, Ralf Buck	Landkäserei Herzog GmbH	OBEG Hohenlohe GmbH & Co. KG
Healthy Powerfood Inh. Nick Neu	Landmann´s Biomarkt II GmbH & Co. KG	ÖKo & Fair
Heggelbach Süd GbR	LaSelva Toskana Feinkost Vertriebs GmbH	Ökoland GmbH Nord
Heidelberger Partnerschaftskaffee e.V.	Lay Gewürze GmbH	Olga Deutschland GmbH
Herbaria Kräuterparadies GmbH	Lecker's Bio Manufaktur GmbH	Ölmühle Hartmann GbR
Heuerhof Elbergen	Lieferkonditorei Johann Langgartner	Ölmühle Moog GmbH
Heuschrecke Naturkost GmbH	LindenGut GmbH & Co. KG	ÖMA Beer GmbH
Hof Lütjen	Maintal Konfitüren GmbH	Optima Feinkost GmbH
Hofgut Kapellenhof	Margarethenhof GmbH & Co. Damm-Kliem KG	OPW Ingredients GmbH
		organic veggie food GmbH
		Original Food GmbH

Ostermühle Naturkost GmbH	Sellthürner Käskuche e.K.	Weltladen Hailer
Packlhof GmbH	Senfmanufaktur Thomas Weber	Wesermühle GbR
PEMA Vollkorn-Spezialitäten GmbH & Co. KG	Sonnentracht GmbH	wieruper hof biobackstube
Peter Riegel Weinimport GmbH	Springer Bio-Backwerk GmbH & Co. KG	Wildwuchs Brauwerk Hamburg KG
Pfluger Ohg	Steffeshof	Zapf-Hof GmbH
Pichler Biofleisch Vertriebs GmbH & Co. KG	Steinkauz-Streuobstwiesen-Projekt GbR	ZG Raiffeisen eG
Plant B GmbH	stick & lembke GmbH	ZiegenUnion Grüne Hügel GbR
PPURA GmbH	Süd West Bio GmbH	ZWERGENWIESE Naturkost GmbH
PrimaVera Naturkorn GmbH	SunflowerFamily GmbH	
Purvegan GmbH	Taifun-Tofu GmbH	
Quint GmbH & Co.KG	tegut... gute Lebensmittel GmbH & Co. KG	
Rainer Tabler	Teutoburger Ölmühle GmbH	
Rapunzel Naturkost GmbH	TOPAS GmbH, Wheaty - The Vegan Way	
REGIONIQUE - Die Produktfabrik GmbH	Töpfer GmbH	
RiCE UP onigiri GmbH	Trierweiler und Pforte GbR	
Riednuss GmbH	Ulmer GmbH & Co.KG	
Rinklin Naturkost GmbH	Ulrich Walter GmbH Lebensbaum	
rosenhof taubertal	Upländer Bauernmolkerei GmbH	
rosmarin BIOBACK e.K. Inh. Ingo Karrasch	Value Food GmbH	
Royal Nature GmbH & Co. KG	VFI Oils for Life GmbH	
Sanatur GmbH	Vier Jahreszeiten Einzelhandels KG	
Schnappinger GmbH	Voelkel GmbH	
Schnelles Grünzeug OWL UG	VollCorner Biomarkt GmbH	
Schnells Kürbiskerne GbR	Vollkornbäckerei Borrek	
Scholderbeck GmbH & Co KG	Vollkornbäckerei Siebenkorn GmbH	
Schönegger Käse-Alm GmbH	Vulkan Brauerei GmbH & Co. KG	
Schubert Bio & Vollwert Bäckerei GmbH & Co.KG	Walter Lang GmbH	
Schwarzwaldmilch GmbH Freiburg	Weingut Feth GbR	
	Weingut Fries	
	Weingut Landmann	