

**JOINT APPEAL TO REJECT THE DEREGULATION OF GENETICALLY MODIFIED
ORGANISMS (GMOS) OBTAINED THROUGH NEW GENOMIC TECHNIQUES (NGTS)
AND TO SUBMIT AN APPEAL TO THE COURT OF JUSTICE OF THE EU (FILING AN
ACTION FOR ANNULMENT)**

14 JULY 2026

Dear Mr. Prime Minister, Dear Mr. Minister of Agriculture,

We, the undersigned representatives of civil society, farmers, food producers, environmentalists, breeders, scientists, and other public figures and organizations, hereby express our appreciation for your consistent rejection of the deregulation of GMOs obtained through new genomic techniques (NGTs). At the same time, we turn to you with an urgent joint appeal: we request that the Slovak Republic, in the interest of protecting the health of its citizens, biodiversity, transparency, and food sovereignty, persist in its dissenting position and file an action with the Court of Justice of the European Union (CJEU) against the approved regulation (action for annulment).

On 17 June 2026, without the adoption of any amendments, the European Parliament plenary voted to adopt a controversial regulation:

„Regulation (EU) 2026/1388 of the European Parliament and of the Council of 17 June 2026 on plants obtained by certain new genomic techniques and their products, and amending Regulation (EU) 2017/625“

The adoption of the regulation in this wording means exempting Category 1 NGT plants from the regulatory framework for GMOs, arbitrarily equating them to conventional crops. In practice, this means the end of mandatory labeling of new genomic technique products as GMOs, the absence of risk assessment, and the loss of traceability and the possibility of banning them.

In this context, we highlight the crucial points of the systemic failure of this new regulation:

- **Destruction of market transparency and loss of consumer sovereignty:** The regulation directly infringes upon the basic right of consumers to know what they consume. By abolishing the mandatory labeling of NGT crops as GMOs, the state resigns from consumer protection and deprives citizens of their freedom of choice. Citizens will no longer be able to distinguish between conventional food and food with modified DNA, which we consider an unacceptable intrusion into the personal integrity and ethical values of the population.
- **Threat to competition, elimination of organic farming, and GMO-free production:** The regulation will make it impossible for growers and processors in conventional and organic agriculture to guarantee the absence of genetically modified ingredients. The loss of transparency and traceability for Category 1 NGTs will lead to irreversible contamination of supply chains, which will undermine public trust and devalue investments in GMO-free production. At the same time, we draw attention to the critical risk of **monopolization of the European seed market**. A narrow group of multinational corporations is already patenting thousands of plants of this category, which, combined with deregulation, will create an unacceptable technological and economic dependence of Slovak farmers on external patent holders. Such a development directly **threatens the food security and sovereignty of the Slovak Republic**, as control over the basic link of the food chain – seed – is shifted into the hands of a narrow group of global actors.
- **Absence of scientific consensus and violation of the precautionary principle:** There is no relevant evidence on the safety of NGT plants or studies demonstrating their equivalence to conventionally bred crops. On the contrary, numerous peer-reviewed studies point to the occurrence of undesired DNA mutations, which can lead to the creation of new toxins or allergens. We view the exemption of these technologies from the mandatory risk assessment process as a direct violation of the precautionary principle enshrined in EU primary law.
- **Uncontrolled spread in the environment and threat to biodiversity:** NGT crops pose an unpredictable risk to natural ecosystems. Given their ability to cross freely with wild relatives and conventionally bred plants, there is a threat of uncontrolled transfer of modified genetic material into the wild. This process can lead to permanent genetic contamination of the native gene pool,

loss of biodiversity, and disruption of ecological balance, while correcting such changes is practically impossible. At the same time, we draw attention to the **high risk for non-target organisms, primarily bees** and other pollinators. Changes in the plant genome can lead to unpredictable changes in the composition of nectar and pollen, which directly threatens the health and reproductive capacity of bee colonies. The disruption of natural food chains and potential toxicity to insects can cause the destabilization of the entire ecological balance. Since bees are a key indicator of a healthy environment and a pillar of agricultural production, we consider any unregulated spread of NGT crops without prior impact assessment on these populations to be a gamble with the biological security of the state.

- **Ignoring the will of citizens:** Organizations and citizens in Slovakia have previously clearly stood against the deregulation of new GMOs obtained through NGTs in a successful petition and mass comments, which were accommodated by the Ministry of Agriculture and Rural Development of the Slovak Republic. Public opinion polls confirm this society-wide demand to maintain strict regulation and transparency, which unites people across the entire political spectrum.

Legal and strategic reasons for filing the petition:

1. **Conflict with CJEU case law:** The new regulation bypasses judgment C-528/16, which confirmed that new techniques of mutagenesis create GMOs and are subject to the relevant regulatory rules.
2. **Conflict with Art. 169 TFEU:** EU law guarantees a high level of consumer protection and their right to information. The approved document deliberately suppresses this right in favor of the commercial interests of a narrow group of multinational corporations.
3. **The precautionary principle (Art. 191 TFEU):** The new regulation ignores the absence of scientific consensus on the safety of NGTs and the risks to health and the environment.
4. **Collision with the Cartagena Protocol:** As a signatory to this international treaty on biosafety, the Slovak Republic cannot accept the abolition of individual risk assessments for GMOs.

The Slovak Republic has a unique opportunity to stand up for the protection of its citizens, the environment, and European standards. We possess independent legal analyses confirming that with a timely filing – for which Slovakia has a strict **two-month deadline** from the publication of the regulation (26 June 2026) – our state has an exceptionally high chance of success, thereby keeping its promise to preserve the current regulation for GMOs (Accommodating the petition: Keep new GMOs strictly regulated and labeled). The aforementioned legal analyses and legal precedents from abroad are attached as an annex to this letter.

We therefore request that you reject the deregulation of NGTs and file an **appeal to the Court of Justice of the EU against the new regulation** (filing an action for annulment) in coordination between the Office of the Government, the Ministry of Agriculture and Rural Development of the Slovak Republic, the Ministry of Justice of the Slovak Republic, and the Ministry of Foreign and European Affairs of the Slovak Republic. At the same time, we request a **personal meeting with the coordinators** of this appeal to present you with complete legal documentation and the stances of both the professional and general public.

We trust that you will stand up for the protection of Slovak consumers and their right to safe and transparent food. We expect you to prioritize the strategic interests of the Slovak Republic in the area of food safety, sovereignty, and biodiversity protection over narrow commercial interests.

Respectfully,

(in alphabetical order [in Sloval language]: individuals, followed by organizations)

1. **Ing. Dušan Bevilaqua PhD.** - landscape ecologist, emeritus director of the Slovak Paradise National Park, founding member of the Slovak Conservation Assembly (*Slovenský ochranársky snem*)
2. **Prof. RNDr. Agáta Fargašová, DrSc.** - leading Slovak toxicologist and environmental safety expert, Faculty of Natural Sciences, Comenius University
3. **Akad. mal. Viliam Hornáček** - initiator and co-author of the Declaration of Sovereignty of the Slovak Republic (by the Slovak National Council) and the project "Za Zdravé Slovensko" (For a Healthy Slovakia), founder of the Society of Slovak Intelligentsia
4. **Doc. Ing. Vladimír Choluš, PhD.** - economist, university lecturer at the Faculty of National Economy, University of Economics in Bratislava
5. **Ing. Gabriela Jamnická, PhD.** - researcher, Head of the Department of Plant Ecophysiology, Institute of Forest Ecology of the Slovak Academy of Sciences
6. **Ing. Miroslav Jureňa** - Minister of Agriculture and Rural Development of the Slovak Republic (2006-2007)
7. **RNDr. Róbert Kanka, PhD.** - ecologist, researcher and Head of the Department of Ecosystems Analysis, Institute of Landscape Ecology of the Slovak Academy of Sciences
8. **RNDr. Mgr. Dominik Roman Letz, PhD.** - vresearcher at the Plant Science and Biodiversity Center of the Slovak Academy of Sciences, Secretary of the Environmental Subcommittee of the Bishops' Conference of Slovakia
9. **Ing. Gabriela Matečná** - agronomist, Minister of Agriculture and Rural Development of the Slovak Republic (2016-2020)
10. **SEODr. Jonáš Maxim, PhD.** - Archbishop and Metropolitan of Prešov, Chairman of the Environmental Subcommittee of the Bishops' Conference of Slovakia
11. **Ing. Radovan Ostrovský, PhD.** - researcher at the Institute of Forest Ecology of the Slovak Academy of Sciences, p.r.i. (public research institution), Department of Phytopathology and Mycology Nitra
12. **Mgr. Zuzana Pavlikovská** - researcher in the field of Soil Remote Sensing, Institute of Landscape Ecology of the Slovak Academy of Sciences
13. **Ing. Katarína Šimončíčová** - conservationist
14. **Doc. Ing. Antónia Štensová, CSc.** - economist and university lecturer at the Department of Marketing and Commerce, Faculty of Management, Comenius University in Bratislava
15. **Ing. Darina Štyriaková, PhD.** - biotechnologist, Forbes Changemaker 2025
16. **Mgr. Marek Ťapák** - actor, screenwriter, director
17. **Ing. Ján Topercer, Csc.** - ecologist and zoologist
18. **Prof. Ing. Peter Urban, PhD.** - Professor of Ecology and Conservation Biology, expert on biodiversity protection, ecological monitoring and environmental impact assessment, Faculty of Natural Sciences, Matej Bel University
19. **Mgr. Katarína Hegedúšová Vantarová, PhD.** -researcher at the Department of Biodiversity and Ecology, Plant Science and Biodiversity Center of the Slovak Academy of Sciences, Editor-in-Chief of the journal *Biologia*
20. **Adamelle Trade, s.r.o.**
21. **Agro družstvo Staré [Agricultural Cooperative Staré]**
22. **AGRO-BIO s.r.o.**
23. **AgroCert, s.r.o.**
24. **Agroekofórum [Agroecoforum]**
25. **Agrokol, spol. s r.o.**
26. **ALASKA FOODS s.r.o.**
27. **Asociácia výrobcov organických hnojív [Association of Organic Fertilizer Manufacturers]**
28. **BIO nákupy s.r.o. - DOBRIO**
29. **BIO spotrebiteľ [BIO Consumer]**

30. **BIOMILA SK, s.r.o.**
31. **Bioraj s.r.o.**
32. **BIOTATRY**
33. **CASTONEL, s.r.o.**
34. **Cech výrobcov medoviny [Guild of Mead Producers]**
35. **Centrum enviromentálnych aktivít [Center for Environmental Activities]**
36. **CEPTA - Centrum pre trvalo udržateľné alternatívy [CEPTA - Centre for Sustainable Alternatives]**
37. **Chateau Selešťany - Winery & Distillery**
38. **CREATEC MSC, s.r.o. - Dobré časy**
39. **DEFENSE s.r.o.**
40. **DRUŽIVA**
41. **Družstvo podielnikov Včelince [Shareholders' Cooperative Včelince]**
42. **Eco-Farm Nitra**
43. **ekolive, s.r.o.**
44. **Ekotrend Slovakia - Zväz ekologického poľnohospodárstva [Ekotrend Slovakia - Union of Organic Agriculture]**
45. **Eladan, s.r.o.**
46. **FARMARIA s.r.o.**
47. **Feliz, s.r.o.**
48. **Foody, s.r.o.**
49. **framipek, s.r.o.**
50. **Gamota Jr., s.r.o.**
51. **Gard&Seed s.r.o.**
52. **Gemernákup, a.s.**
53. **Greenpeace Slovensko [Greenpeace Slovakia]**
54. **Madonan s.r.o.**
55. **MT - SHR**
56. **My sme les [We Are the Forest]**
57. **NELAPEK s.r.o.**
58. **NoStress.sk s.r.o.**
59. **PD Nová Ľubovňa [Agricultural Cooperative Nová Ľubovňa]**
60. **PD so sídlom v Smrečanoch [Agricultural Cooperative based in Smrečany]**
61. **Poľana - podielnicke družstvo Jarabina [Poľana - Cooperative Jarabina]**
62. **Poľnohospodárske družstvo Dolný Ohaj [Agricultural Cooperative Dolný Ohaj]**
63. **Poľnohospodárske družstvo Krakovany - Stráže [Agricultural Cooperative Krakovany - Stráže]**
64. **PPD Liptovská Teplička [Agricultural and Shareholder Cooperative Liptovská Teplička]**
65. **quid est VERITAS**
66. **SEMA HŠ, s.r.o.**
67. **SLOVAK NATURE s.r.o. - Sladký košík**
68. **Slovenská asociácia regeneratívneho poľnohospodárstva [Slovak Association of Regenerative Agriculture]**
69. **Slovenská botanická spoločnosť pri SAV [Slovak Botanical Society at the Slovak Academy of Science]**
70. **Slovenská poľovnícka komora [Slovak Chamber of Hunting]**
71. **Slovenská spoločnosť mlynárov [Slovak Society of Millers]**
72. **Slovensko bez GMO [Slovakia GMO-Free]**
73. **Slovenský zväz agropodnikateľov a rodinných fariem [Slovak Union of Agro-entrepreneurs and Family Farms]**
74. **Slovenský zväz pekárov, cukrárov a cestovinárov [Slovak Union of Bakers, Confectioners and Pasta Producers]**

75. **Slovenský zväz včelárov [Slovak Union of Beekeepers]**
76. **Slovenský zväz záhradkárov, republikový výbor [Slovak Union of Allotment and Leisure Gardeners, National Committee]**
77. **Slow Food Pressburg**
78. **Slow Food Tatry**
79. **SOSNA, o.z.**
80. **Spoločnosť slovenskej inteligencie KORENE [Society of Slovak Intelligentsia KORENE]**
81. **Škola permakultúry [School of Permaculture]**
82. **Včelárstvo Dušan Dedinský [Beekeeping Dušan Dedinský]**
83. **Vidiecka platforma [Rural Platform]**
84. **Vidiecky parlament na Slovensku [Rural Parliament in Slovakia]**
85. **Vlastenecký inštitút Petra Šveca [The Peter Švec Patriotic Institute]**
86. **Weis & Partners s.r.o.**
87. **ZPD - Zeleninársko potravinárske družstvo [ZPD - Vegetable and Food Cooperative]**
88. **Zväz výrobcov krmív, skladovateľov a obchodných spoločností [Association of Feed Manufacturers, Storekeepers and Trading Companies]**
89. **ŽIVEA s.r.o.**

International support of the appeal:

The following experts and organizations from abroad also join the submitted appeal:

(in alphabetical order [in Sloval language]: individuals, followed by organizations)

90. **Prof. Michael Antoniou, MA (Oxon) PhD.** - Professor of Molecular Genetics at the Department of Medical and Molecular Genetics, King's College London, United Kingdom
91. **Prof. Dr. Gunter Backes, PhD (Dr. agr.)** - University of Kassel – Faculty of Organic Agricultural Sciences, Section of Organic Plant Breeding/Agrobiodiversity, Germany
92. **Prof. Dr. Martina Bavec, PhD.** - organic agriculture expert, Institute of Organic Agriculture, Faculty of Agriculture and Life Sciences, University of Maribor, Slovenia
93. **Dr. Yves Bertheau, PhD, HDR** - Senior Researcher at INRAE, MNHN CNRS Sorbonne Université, France
94. **Dr. Elisabeth Bücking, Dipl. Biol.** (molecular biology, soil biology) - Emerita Researcher, Forest Research Institute Baden-Württemberg, Germany
95. **Dr. Winfried Bücking** - Emeritus Botanist, Baden-Württemberg Forest Research Station Freiburg, Germany
96. **Dr. Georg Buchholz** - lawyer, expert in environmental law and biosafety legislation, Germany
97. **Ing. Frans Carree** - Head of Breeding Department at De Bolster Organic Seeds, Netherlands
98. **Isabelle Denaro, MBA** - director and producer at Make Impact Films, Denmark
99. **Dr. Jérôme Enjalbert, HDR** - geneticist and agroecologist, Research Director at INRAE, Quantitative Genetics and Evolution Laboratory – Le Moulon Université Paris-Saclay, France
100. **Ole Faergeman, MD, DMSc.** - Emeritus Professor of Preventive Cardiology, Aarhus University Hospital, member of ENSER, Denmark
101. **Prof. Dr. Christine Frison, PhD.** - Professor of International Environmental Law specializing in agrobiodiversity governance, University of Liège, Belgium
102. **Dr. Eva Gelinsky** - agricultural researcher, scientific advisor to ProSpecieRara, member of the Federal Ethics Committee on Non-Human Biotechnology, Switzerland
103. **Dr. Isabelle Goldringer** - Senior Researcher in population genetics, INRAE (French National Research Institute for Agriculture, Food and Environment), France
104. **Prof. Pierre-Henri Gouyon, PhD, MPhil** - Emeritus Researcher, MNHN CNRS Sorbonne Université, France
105. **Martin Graf, MSc** - ETH Zurich Faculty of Agriculture alumnus, Minister of Justice of the Canton of Zurich (2011-2015), President of the Fintan Foundation

- 106.**Prof. Dr. Tina Heger** - ecologist specializing in biological invasions, Professor at the Technical University of Munich, School of Life Sciences, Leibniz Institute of Freshwater Ecology and Inland Fisheries (IGB), Leuphana University Lüneburg, Institute of Ecology, Germany
- 107.**Prof. Jack Heinemann, PhD, FHEA** - molecular biologist - University of Canterbury, New Zealand
- 108.**Dr. Angelika Hilbeck** - Emerita Lecturer with 30 years of experience in biosafety and environmental risk assessment of GMOs at the ETH Zurich institute, Switzerland
- 109.**Frédéric Jacquemart, PhD.** - medical biologist, Emeritus Researcher in immunology at the Pasteur Institute, President of GIET (Groupe International d'Etudes Transdisciplinaires), France
- 110.**Prof. Giuseppe Longo** - Emeritus Professor DR-CNRS (mathematics, epistemology, theoretical biology) - Centre Cavaillès, République des Savoirs, CNRS et Ecole Normale Supérieure, Paris, France
- 111.**Prof. Erik Millstone, MA, MPhil, PhD.** - Emeritus Professor at the Science Policy Research Unit, University of Sussex, United Kingdom
- 112.**Dr. Polyxeni Nicolopoulou-Stamati MD. PhD.** - Chair of ENSSER (European Network of Scientists for Social and Environmental Responsibility), Professor of Environmental Pathology at the Med. School University of Athens, Associate Member of the Club of Rome, Greece
- 113.**Prof. Dr. Maria Ewa Rembiałkowska** - organic agriculture expert, Warsaw University of Life Sciences, Association Forum of Organic Agriculture named after M. Górny, Poland
- 114.**Diederick Sprangers MSc.** - biochemist, Scientific Coordinator of ENSSER (European Network of Scientists for Social and Environmental Responsibility), Netherlands
- 115.**Assoc. Prof. Dr. Tina Ternjak** - researcher in the field of genetics and plant genetic resources, Department of Genetics, Faculty of Agriculture and Life Sciences, University of Maribor, Slovenia
- 116.**Prof. Dr. Katja Tielbörger** - Head of Plant Ecology Group, speaker of the Working Group for New Genomic Techniques of the Ecological Society of Germany, Austria and Switzerland (GFÖ), University of Tübingen, Germany
- 117.**Tjaša Trinko, P.b.s.** - researches Slovenian consumers' attitudes towards products obtained through new genomic techniques, Food Safety in Food Chain, Faculty of Agriculture and Life Sciences, University of Maribor, Slovenia
- 118.**Dr. Michel Volovitch, HDR-** Emeritus Professor, Department of Biology - Ecole Normale Supérieure de Paris & Lab Physical and Biological Chemistry UMR8228 CNRS, Department of Chemistry, Ecole Normale Supérieure, France
- 119.**Allison Wilson, PhD.** - Science Director, The Bioscience Resource Project, Ithaca NY, USA
- 120.**Ir. Ellen Winkel** - Editor-in-Chief of the journal Dynamisch Perspectief of the Biodynamic Association, Netherlands
- 121.**Assoc. Prof. Dr. Johann G. Zaller** - ecologist studying non-target effects of agrochemistry, Department of Ecosystem Management, Climate and Biodiversity, Institute of Zoology, Boku University, Austria

International, European and regional organizations:

- 122.**Biodynamic Federation Demeter International**, Global
- 123.**IFOAM (Organics International) Seeds Platform**, Global
- 124.**Navdanya International**, Global
- 125.**Agroecology Europe**, EU
- 126.**BeeLife - European Beekeeping Coordination**, EU
- 127.**Corporate Europe Observatory**, EU
- 128.**ENGA (European Non-GMO Industry Association)**, EU
- 129.**ENSSER - European Network of Scientists for Social and Environmental Responsibility**, EU
- 130.**European Consortium for Organic Plant Breeding (ECO-PB)**, EU
- 131.**European Coordination Via Campesina**, EU

- 132.Friends of the Earth Europe, EU
- 133.IFOAM Organics Europe, EU
- 134.SAFE Safe Food Advocacy Europe, EU
- 135.Balkan Biocert, Balkans
- 136.Balkan Federation of Apicultural Associations, Balkans
- 137.BALKANI Wildlife Society, Balkans
- 138.Balkan Seed Network Association, Balkans

Belgium:

- 139.FAB - BBF [Belgian Beekeeping Federation]
- 140.FUGEA [United Federation of Breeders' and Farmers' Groups]
- 141.Mouvement d'action paysanne [Peasant Action Movement]
- 142.Vitale Rassen [Vital Varieties]
- 143.Voedsel Anders [Food Otherwise]
- 144.Working Group on Natural Beekeeping

Bulgaria:

- 145.AGROLINK Association
- 146.ALOS - Association Center for Informal Education and Cultural Activities
- 147.Bulgarian Environmental Partnership Foundation
- 148.Foundation for Organic Agriculture BIOSELENA
- 149.Human Library Foundation
- 150.PoleRani Association
- 151.Public Environmental Center for Sustainable Development
- 152.Research Practices Association
- 153.Za Zemiata - Friends of the Earth Bulgaria

Croatia

- 154.Association Green Istria
- 155.Biovrt - u skladu s prirodom [Biogarden - in Harmony with Nature]
- 156.Community Seed Bank ZMAG
- 157.HSEP Hrvatski savez udruga ekoloških proizvođača [Croatian Association of Organic Producers]
- 158.PAN, Association for Environment and Nature Protection
- 159.Permacultura Dalmacija [Permaculture Dalmatia]
- 160.Zemljane staze - Earth Trek

Czechia

- 161.Demeter CS

Denmark:

- 162.Biodynamic Association
- 163.Det Fælles Bedste - The Common Good
- 164.Foreningen Frøsamlerne - [The Seed Savers Association]
- 165.Frie Bønder - Levende Land [Free Farmers - Living Land]
- 166.Grønt Marked - Farmer Market
- 167.Københavns Fødevarefællesskab [Copenhagen Food Co-op]
- 168.Landsforeningen Praktisk Økologi [National Association for Practical Ecology]
- 169.Landsorganisationen Grøn Hverdag [National Organization Green Everyday]
- 170.Miljøbevægelsen NOAH [Environmental Movement NOAH]
- 171.Permakultur Danmark [Permaculture Denmark]

172.Self-sustaining Cities

Estonia:

173.Estonian Permaculture Association

Finland:

174.Suomen Pemakultturiyhdistys [Finnish Permaculture Association]

France:

175.APSODA (Association pour la Suppression des OGM dans l'Alimentation): Association for the Elimination of GMOs in Food

176.Amis de la Terre Landes France [Friends of the Earth Landes France]

177.Association Graines De Troc

178.Association Kokopelli

179.Association Sciences Citoyennes [Citizen Science Association]

180.Association Vigilance OGM 46

181.Confédération paysanne [Peasant Confederation]

182.Désobéissance Fertile [Fertile Disobedience]

183.Fédération Nature & Progrès [Nature & Progress Federation]

184.Ferme biologique du Bec Hellouin [Bec Hellouin Organic Farm]

185.FNAB (Fédération nationale d'agriculture biologique) [National Federation of Organic Agriculture]

186.Foll'avoine [Foll'avoine Biodiversity Protection Association]

187.France Nature Environnement

188.GIET (Groupe International d'Études Transdisciplinaires) [International Group for Transdisciplinary Studies]

189.MODEF [Movement for the Defense of Family Farmers]

190.Mouvement de l'Agriculture BioDynamique [Biodynamic Agriculture Movement]

191.Mouvement des Faucheurs volontaires [Voluntary Reapers Movement]

192.Mouvement des Femmes Semencières [Women Seed Savers Movement]

193.POLLINIS

194.Réseau Semences Paysannes [Peasant Seeds Network]

195.SOL - Alternatives Agroécologiques et Solidaires [Agroecological and Solidarity Alternatives]

Greece:

196.AEGILOPS [Greek Network for Biodiversity and Ecology in Agriculture]

197.MedINA (Mediterranean Institute for Nature and Anthropos)

198.PANDOIKO - Pan-Hellenic Network of Ecological Organisations

199.SITO Seeds

Netherlands:

200.BioNederland

201.Biowinkelvereniging [Organic Shop Association]

202.De Bolster Organic Seeds

203.Stichting Zaadgoed [Seed Fund Foundation]

204.Toekomstboeren [Future Farmers]

205.Vereniging voor Biodynamische Landbouw en Voeding [Association for Biodynamic Agriculture and Nutrition]

Ireland:

- 206.**GM Free Ireland Network**
- 207.**Irish Seed Savers Association**

Luxembourg:

- 208.**Fondation Hëllef fir d'Natur' [Help for Nature Foundation]**
- 209.**Vereenegung fir Biolandwirtschaft Lëtzebuerg a.s.b.l. - [Association for Organic Agriculture]**

Hungary:

- 210.**Biokontroll Hungaria Nonprofit Kft.**
- 211.**Kelet-Magyarországi Biokultúra Egyesület (East Hungarian Organic Association)**
- 212.**Magyar Biokultúra Szövetség [Hungarian Bioculture Federation]**
- 213.**Magyar Természetvédők [Friends of the Earth Hungary]**
- 214.**Nyugat-Dunántúli Biokultúra Egyesület [West-Transdanubian Bioculture Association]**
- 215.**OMKI - Hungarian Research Institute of Organic Agriculture**

Germany:

- 216.**Action Alliance for GMO-Free Agriculture in Baden-Württemberg**
- 217.**Alliance for a Region Free of Agro-genetic Engineering around Ulm**
- 218.**Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL) e.V. - [Association of Family Farmers]**
- 219.**Bioland**
- 220.**BUND Naturschutz in Bayern [Friends of the Earth Bavaria]**
- 221.**Bündnis für gentechnikfreie Landwirtschaft Niedersachsen [Alliance for GMO-Free Agriculture in Lower Saxony]**
- 222.**Demeter Germany**
- 223.**Dreschflegel e.V. [Dreschflegel Association]**
- 224.**Dreschflegel GbR [Dreschflegel Partnership]**
- 225.**Gen-ethisches Netzwer e.V. [Gen-ethical Network]**
- 226.**IG Saatgut [Interests Association for GMO-Free Seed Work]**
- 227.**Imkerverband Rheinland-Pfalz e.V. [Beekeeping Association of Rhineland-Palatinate]**
- 228.**Immanuel Kant-Stiftung – Europas Erbe als Auftrag [Immanuel Kant Foundation – Europe's Heritage as a Mission]**
- 229.**Interessengemeinschaft gegen Nachbaugebühren [Interests Association Against Farm-Saved Seed Fees]**
- 230.**Katholische Landbewegung Freiburg [Catholic Rural Movement Freiburg]**
- 231.**Lebende Samen e.V. [Living Seeds Germany]**
- 232.**NaturFreunde Baden-Württemberg e. V. - [Friends of Nature Baden-Württemberg]**
- 233.**Naturland**
- 234.**Save our Seeds**
- 235.**Verband des Katholischen Landvolks e.V. [Association of Catholic Rural People]**
- 236.**Verband Lebensmittel ohne Gentechnik (VLOG) [Association of Food Without Genetic Engineering]**

Norway:

- 237.**Biodynamisk Forening Norge [Biodynamic Association of Norway]**
- 238.**Bondens market Norge [Farmers' Market Norway]**
- 239.**Økologisk Norge [Organic Norway]**

Poland:

- 240.**Association Forum of Organic Agriculture named after M. Górný**

- 241. **Ekoland - Association of Organic Food Producers, West-Pomeranian Branch**
- 242. **Foundation AgriNatura for Agricultural Biodiversity**
- 243. **Moc Korzeni [Power of Roots]**
- 244. **Polish Ecological Club in Gliwice**
- 245. **Polish Chamber of Organic Food**
- 246. **Spoleczny Instytut Ekologiczny [Power of Roots]**

Portugal:

- 247. **Asociácia Bolgan Studi e Salute - Bolgan Štúdie a Zdravie**
- 248. **Association Demeter Portugal**
- 249. **Living Seeds - Sementes Vivas SA**

Austria:

- 250. **ARCHE NOAH, Association for the Conservation and Development of Cultivated Plant Diversity**
- 251. **ARGE Gentechnik-frei (Arbeitsgemeinschaft für Gentechnik-frei erzeugte Lebensmittel) [Platform for GMO-Free Foodstuff]**
- 252. **Austrian Federal Chamber of Labour**
- 253. **Bio Austria - Organic Farmers Association**
- 254. **Global 2000**
- 255. **Naturschutzbund Österreich [Austrian League for Nature Conservation]**
- 256. **Verein Natur im Garten [Nature in the Garden Association]**

Romania:

- 257. **ARAD [Romanian Association for Sustainable Agriculture]**
- 258. **ROMAPIS-Federatia Asociatiilor Apicole din Romania [Federation of Beekeeping Associations of Romania]**

Slovenia:

- 259. **Association Ekoci - eco civil initiative of Slovenia**
- 260. **Ekosemena - Organic Seed Institute**
- 261. **Institute of Organic Agriculture**
- 262. **KGZS - Kmetijsko gozdarska zbornica Slovenije [Chamber of Agriculture and Forestry of Slovenia]**
- 263. **RGA d.o.o. - Research Genetics and Agrochemistry**
- 264. **Umanotera**
- 265. **Založba AJDA Vrzenec [AJDA Vrzenec Publishing]**
- 266. **Združenje Demeter Slovenje [Demeter Association Slovenia]**
- 267. **Zveza biodinamikov Slovenje [Association of Biodynamic Farmers of Slovenia]**

Spain:

- 268. **Ecologistas en Acción [Ecologists in Action]**
- 269. **Grain**
- 270. **Revista Soberania Alimentaria, Biodiversidad y Culturas [Food Sovereignty, Biodiversity and Cultures Magazine]**

Sweden:

- 271. **FOBO - Förbundet Organisk Biologisk Odling [Association for Organic Biological Cultivation]**

Italy:

- 272. **Associazione coltivare condividendo [Cultivate and Share Association]**

- 273. **Associazione Italiana Agricoltura Biologica [Italian Association for Organic Agriculture]**
- 274. **Centro Internazionale Crocevia [Crocevia International Center]**
- 275. **European Consumers APS**
- 276. **FIRAB - Italian Foundation for Research in Organic and Biodynamic Agriculture**

Organizations from non-EU countries:

- 277. **Fondacija Alica [Alica Foundation]**, Bosna and Hercegovina
- 278. **SYNAPARCAM (Synergie Nationale des Paysans et Riverains du Cameroun) [National Synergy of Peasants and Local Residents of Cameroon]**, Cameroon
- 279. **EcoLocal Association**, Moldova
- 280. **Beyond GM**, United Kingdom
- 281. **Down to Earth Gloucestershire CIC**, United Kingdom
- 282. **Garden Organic & The Heritage Seed Library**, United Kingdom
- 283. **GM Freeze**, United Kingdom
- 284. **GM Watch**, United Kingdom
- 285. **Local Community Market Gardens CIC**, United Kingdom
- 286. **South East Essex Organic Gardeners**, United Kingdom
- 287. **Biorespect**, Switzerland
- 288. **Bio Suisse**, Switzerland
- 289. **Demeter Schweiz**, Switzerland
- 290. **Die Bioladen-Genossenschaft [The Organic Food Shop Cooperative]**, Switzerland
- 291. **Getreidezüchtung Peter Kunz [Cereal Breeding Peter Kunz]**, Switzerland
- 292. **SAG - Swiss Alliance for a GMO-free Agriculture**, Switzerland
- 293. **Sativa Rheinau AG**, Switzerland
- 294. **Swissaid**, Switzerland
- 295. **Uniterre**, Switzerland
- 296. **Urban Agriculture Basel**, Switzerland
- 297. **Verein für gentechnikfreie Lebensmittel [Association for GMO-Free Food]**, Switzerland
- 298. **Verein Gen Au Rheinau [Gen-au Rheinau Association]**, Switzerland
- 299. **ZÜRCHER TIERSCHUTZ [Zurich Animal Protection]**, Switzerland
- 300. **Institute of Socio-Economic Regional Studies**, Ukraine

Enclosures:

1. Original and translation of the legal analysis "Legal grounds to Challenge NGTs deregulation" by the Artemisia company: 1x + 1x (provided with the 1st version of the appeal dated 30 April 2026)
2. Original and translation of the abridged version of the legal analysis "EU-verordnung über neue genetische Techniken (NGT): zur Verletzung des Vorsorgeprinzips" by Dr. Georg Buchholz: 1x + 1x (provided with the 1st version of the appeal dated 30 April 2026)
3. Original and translation of the legal analysis "EU-verordnung über neue genetische Techniken (NGT): zur Verletzung des Vorsorgeprinzips" by Dr. Georg Buchholz: 1x + 1x (provided with the 1st version of the appeal dated 30 April 2026)
4. Precedent - Judgment of the High Court in London in the case of Beyond GM and others v. Secretary of State for Environment, Food and Rural Affairs dated 4 June 2026: 1x (provided with the 2nd version of the appeal dated 17 June 2026)
5. Original and translation of the draft appeal to the European Court of Justice: 1x (provided with the 2nd version of the appeal dated 17 June 2026)
6. Original and translation of the draft brief summary of the grounds and arguments for filing the petition: 1x + 1x (provided with the 2nd version of the appeal dated 17 June 2026)

Scientific studies and analyses supporting the arguments of the appeal:

1. **KOLLER, F., 2025.** The Potential of NGTs to overcome constraints in plant breeding and their regulatory implications. *International Journal of Molecular Sciences*. 26(23), 11391. DOI: 10.3390/ijms262311391.
2. **KOLLER, F. et al., 2023.** The need for assessment of risks arising from interactions between NGT organisms from an EU perspective. *Environmental Sciences Europe*. 35, čl. č. 27. DOI: 10.1186/s12302-023-00734-3.
3. **KOLLER, F. a M. CIESLAK, 2023.** A perspective from the EU: unintended genetic changes in plants caused by NGT — their relevance for a comprehensive molecular characterisation and risk assessment. *Frontiers in Bioengineering and Biotechnology*. 11, 27. október. Sekcia: Biosafety and Biosecurity. DOI: 10.3389/fbioe.2023.1276226.
4. **CHU, P. a S. Z. AGAPITO-TENFEN, 2022.** Unintended genomic outcomes in current and next generation GM techniques: A systematic review. *Plants*. 11, 2997. PMID: 36365450.
5. **KAWALL, K. et al., 2020.** Broadening the GMO risk assessment in the EU for genome editing technologies in agriculture. *Environmental Sciences Europe*. 32, čl. č. 106. DOI: 10.1186/s12302-020-00361-2.
6. **GELINKSY, E. a A. HILBECK, 2018.** European Court of Justice ruling regarding new genetic engineering methods scientifically justified: a commentary on the biased reporting about the recent ruling. *Environmental Sciences Europe*. 30(1), s. 52. DOI: 10.1186/s12302-018-0182-9.
7. **ECKERSTORFER, M. F. et al., 2019.** An EU perspective on biosafety considerations for plants developed by genome editing and other new genetic modification techniques (nGMs). *Frontiers in Bioengineering and Biotechnology*. 7, s. 31. DOI: 10.3389/fbioe.2019.00031.
8. **KAWALL, K., 2019.** New possibilities on the horizon: Genome editing makes the whole genome accessible for changes. *Frontiers in Plant Science*. 10, s. 525. DOI: 10.3389/fpls.2019.00525.
9. **BANTELE, S. et al., 2025.** Repair of DNA double-strand breaks leaves heritable impairment to genome function. *Science*. 390(6773). DOI: 10.1126/science.adk6662.
10. **WINTER, Gerd, 2024.** The European Union's deregulation of plants obtained from new genomic techniques: a critique and an alternative option. *Environmental Sciences Europe*. 36(1), s. 47 [cit. 2026-06-15]. ISSN 2190-4715. DOI: 10.1186/s12302-024-00867-z.
11. **ANSES, 2024.** OPINION of the French Agency for Food, Environmental and Occupational Health & Safety on methods for assessing the health and environmental risks and socio-economic issues associated with plants obtained using certain new genomic techniques (NGTs). Maisons-Alfort: ANSES, 22. január 2024. Request No 2021-SA-0019 [cit. 2026-06-15]. Dostupné na: <https://www.anses.fr/fr/system/files/BIORISK2021SA0019EN.pdf>
12. **REICHENBECHER, Wolfram et al., 2024.** For a science-based regulation of plants from new genetic techniques [online]. Ed. Federal Agency for Nature Conservation (BfN). Bonn: BfN, február 2024. Policy Brief #02/2024 [cit. 2026-06-15]. DOI: 10.19217/pol241en. Dostupné na: https://www.bfn.de/sites/default/files/2024-02/24_02_07_BfN_policy_brief_NGT-7.pdf
13. **ECKERSTORFER, Michael a Andreas HEISSENBERGER, 2023.** New Genetic Engineering - possible unintended effects [online]. Wien: Kammer für Arbeiter und Angestellte für Wien. Informationen zur Umweltpolitik, Bd. 208. ISBN 978-3-7063-1007-9 [cit. 2026-06-15]. URN: urn:nbn:at:at-akw:g-6550206. Dostupné na: <https://emedien.arbeiterkammer.at/viewer/!toc/AC16982244/1/-/>
14. **GELINSKY, E., 2026.** New GMOs Market Report 2026: Which crops are present in different markets and in development pipelines? [online]. Brussels: European Non-GMO Industry Association (ENGA), semnar, The Non-GMO Project [cit. 2026-07-09]. Dostupné z: https://www.enga.org/fileadmin/user_upload/New_GMOs_market-report-2026.pdf

The expression of support is linked to the content of this appeal. Other signatories were not known to the individual participants at the time of signing. This appeal serves as a supplement to the previous appeals of 30 April 2026 and 17 June 2026 delivered to the Prime Minister of the Slovak

Republic, the Minister of Agriculture and Rural Development of the Slovak Republic, and for information to the Minister of Justice of the Slovak Republic, and the Minister of Foreign and European Affairs of the Slovak Republic.

Given the strategic importance of the issue at hand, in addition to being addressed to the Prime Minister of the Slovak Republic and the Minister of Agriculture and Rural Development of the Slovak Republic, this appeal is also submitted for information specifically to the President of the Slovak Republic, the Minister of Justice of the Slovak Republic, the Minister of Foreign and European Affairs of the Slovak Republic, and the Minister of the Environment of the Slovak Republic.