

Protecting Animal Welfare and Public Trust:
Concerns regarding the regulation of New Genomic Techniques in animals

9 July 2026

Dear Commissioner Várhelyi,

Dear Commissioner Hansen,

Dear Executive Vice President Stéphane Séjourné,

Ongoing discussions around the application of New Genomic Techniques (NGT) to animals, and the potential revision of the EU regulatory framework governing genetically modified animals, compel our organisations to raise a number of serious concerns.

The European Union has recently moved to significantly relax the regulatory framework governing certain NGT plants by removing key requirements such as risk assessment and consumer labelling for a broad category of genetically modified crops. We understand that the European Commission is now preparing an initiative concerning genetically modified animals, particularly those developed using NGTs, while industry groups such as EFFAB are calling for these animals to be excluded from existing EU GMO legislation in a similar manner. As organisations from the animal welfare, environmental, farming, food policy, and other sectors, to name just a few, we strongly oppose any attempt to weaken or relax the current regulatory framework governing genetically modified animals.

Our first concern relates to the breeding objectives currently being pursued through genetic engineering. Most NGT applications in farmed animals are linked, directly or indirectly, to increasing productivity. Yet the consequences of decades of productivity-driven breeding are already well documented across the scientific literature and reflected in the daily experience of farmers, beekeepers and veterinarians. The selection of animals for rapid growth, very high yields, large litters and extreme production traits has contributed to serious health and welfare problems across all major farmed animal species, including lameness in broiler chickens, metabolic disorders in high-yield dairy cattle, cardiovascular failure in fast growing pigs, as well as skeletal problems. These are the legacy of breeding animals primarily for output. We are deeply concerned that NGTs may accelerate this course, allowing extreme production traits to be introduced more rapidly and extensively into farmed animal populations.

Some proponents argue that NGTs can improve animal welfare by creating disease-resistant animals or animals with traits such as hornless cattle or pigs without tails. However, these approaches fail to address the root causes of many welfare and health problems. Disease outbreaks and antimicrobial resistance are substantially driven by overcrowding, stressful housing conditions, inadequate management practices, poor biosecurity and genetic uniformity. Similarly, engineering animals to avoid injuries caused by intensive production systems risks adapting animals to harmful environments rather than improving those environments. Farmed animals should not be genetically modified to better tolerate inadequate systems. Instead, farming systems should be improved to protect animal welfare and animal health.

We are also concerned about the welfare implications of the development process itself. The creation of genetically engineered animals frequently relies on embryo manipulation, cloning techniques, surrogate pregnancies and other invasive procedures. These methods are often associated with high rates of developmental failure, health complications and suffering for the animals involved long before any commercial application is reached. Furthermore, evidence from gene-editing research demonstrates that unintended and unpredictable genetic alterations can occur, raising the possibility of additional welfare harms. Such uncertainties underline the need for stringent and independent oversight rather than regulatory relaxation.

Beyond animal welfare concerns, there are important regulatory and societal considerations. Once NGT traits enter commercial breeding populations, their dissemination through animal genetics can be rapid and difficult to reverse. This makes robust case-by-case risk assessment, traceability and consumer labelling essential. Rolling back these safeguards before the long-term impacts on animal welfare, biodiversity, ecosystems and food systems are fully understood would be incompatible with the EU's precautionary principle and its commitments to sustainable agriculture.

Public trust in EU food and agricultural policy depends on transparency, accountability and a demonstrated commitment to animal welfare. Weakening the regulatory framework governing genetically modified animals at this stage would undermine those principles and run counter to the expectations of many European citizens.

There are better and safer ways to achieve many of the objectives often cited in support of NGT animals. Improvements in animal husbandry, housing, management practices, breeding strategies and farming conditions can address many health and welfare challenges without introducing the risks and ethical concerns associated with genetic engineering. What farmed animals need are better living conditions, not genetic shortcuts designed to sustain inherently problematic production systems.

For these reasons, we strongly oppose the genetic engineering of animals and any attempt to weaken or relax the EU GMO legislation in order to accelerate the development and market access of GM animals.

We call on the Commission to:

- Maintain rigorous risk assessment and authorisation requirements for all GM animals, including honey bees
- Ensure full traceability throughout the supply chain as well as consumer labelling of products derived from GM animals
- Exclude NGT animals from any deregulatory pathway analogous to the approach adopted for Category 1 NGT plants
- Prioritise investment in improvements to farming systems, animal husbandry and animal welfare rather than technological adaptation of animals to intensive conditions
- Guarantee meaningful participation of civil society and independent experts in any future regulatory review

Our organisations welcome the opportunity to engage with the Commission on these matters.

Yours sincerely,

1. Olga Kikou, Animal Advocacy & Food Transition
2. Clara Behr, Biodynamic Federation Demeter International
3. Benedikt Haerlin, Save Our Seeds
4. Pat Thomas, Beyond GM/A Bigger Conversation
5. Leonie Nimmo, GM Freeze
6. Bernd Rodekohl and Gregor Erkel, Aurelia Stiftung
7. Jürgen Binder, Neuer Imkerbund
8. Samuel Matejíčka, Slovensko bez GMO
9. Samuel Matejíčka, Quid Est Veritas
10. Martin Schulz, Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL) e.V.
11. Dr. Matteo Metta, Agroecology Europe
12. Claire Robinson, GMWatch
13. Judith Düesberg, Gen-ethisches Netzwerk e.V.
14. Nina Holland, Corporate Europe Observatory
15. Vinciane Patelou, Compassion in World Farming
16. Inês Grenho Ajuda, Eurogroup for Animals
17. Claire Stockwell, IATP Europe
18. Mute Schimpf, Friends of the Earth Europe
19. Kirsty Henderson, Anima International
20. Pia Voelker, BUND
21. Giulia Gouet, Slow Food
22. June Rebekka Bresson, NOAH - Friends of the Earth Denmark
23. Rune-Christoffer Dragsdahl, Dansk Vegetarisk Forening
24. Ruth Marie Jensen Kondrup, Permakultur Danmark
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33. Maximilian Schneider, Bioland e.V.
34. Torsten Ellmann, Deutscher Imkerbund e.V. (DIB)
35. Vasso Kanellopoulou, SITOseeds Greece
36. Dirk Jan Verdonk, World Animal Protection Netherlands
37. Caroline Rowley, Ethical Farming Ireland
38. Christian Rehmer, Albert Schweitzer Foundation
39. Dr. Christoph Then, Testbiotech
40. Marco Contiero, Greenpeace Europe Unit
41. Patrick ten Brink, European Environmental Bureau
42. Svetla Nikolova, AGROLINK Association

