Statement on the Biotech Act

by the Study Group "One Health-One Earth" of the Federation of German Scientists (VDW)

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No release of genetically modified microorganisms without a robust case-by-case risk assessment – including their interactions with the environment – and without mandatory long-term monitoring

The occasion: On 16 December 2025, as part of the European Biotech Act, the European Commission presented proposal COM(2025) 1031. It is intended to amend Directive 2001/18/EC on the deliberate release of genetically modified organisms into the environment as regards the placing on the market of genetically modified microorganisms (GMMs) and, in the Commission's words, to make authorisation procedures "more efficient" and "more tailored". GMMs are to be brought to market more quickly. On 16 June 2026, the Council of the European Union adopted a general approach with amendments. According to the current timetable, the European Parliament is to adopt its position in November 2026.[1][2][3] Since 10 September 2026, 403 amendments tabled by committee members have been on the table for the draft report by co-rapporteurs Marta Temido and Adam Jarubas (PE789.094).[31]

In the view of the VDW, the proposed amendments lower central protective mechanisms in a way that cannot be justified scientifically. Case-by-case risk assessment would formally remain in place; at the same time, individual information and testing requirements are to be reduced and environmental monitoring could be waived entirely in certain cases. For microorganisms this has far-reaching consequences, because in the points relevant to risk they differ fundamentally from plants and animals: they reproduce with very short generation times, evolve rapidly and exchange genetic material across species and habitat boundaries – bacteria in particular. In doing so, they intervene in complex microbial and ecological networks. A genetically engineered restriction of the capacity to replicate or spread is not a permanently reliable barrier. Once GMMs have become established or have passed on their genetic material, retrieval is possible only in exceptional cases, if at all; environmental changes can be severe and irreversible. Precisely for this reason, regulatory acceleration must not weaken scientific precaution.[6][15]

It follows that lowering the standards for risk assessment cannot be justified against this background. An indispensable precondition for any release, and for any placing on the market, of a GMM that leads or may lead to environmental exposure is an independent, interdisciplinary, science-based risk assessment of the individual case, in which interactions with the environment and the risks arising from them are examined. What matters is the specific strain or vector, the specific genetic modification, the intended application, its spatial and temporal scale, and the specific receiving environment. Where a robust assessment, detectability, monitoring and effective risk containment cannot be ensured, there must be no release.[6][15]

VDW core demands

- **No lowering of the regulatory requirements for risk assessment or of the regulatory protective mechanisms governing the release of genetically modified microorganisms (GMMs).** Simplifying and accelerating authorisation procedures must not lead to reduced requirements for assessment, detection, monitoring or reassessment.
- **Case-by-case assessment:** Releases of GMMs require a case-by-case risk assessment that captures the specific application and its interactions with the environment. QPS[1] or other blanket categories or procedures must not result in required data, testing or monitoring requirements being reduced pre-emptively, or in relevant environmental questions being excluded wholesale from the case-by-case assessment. "Low risk" can be the outcome of the assessment, not its starting assumption.
- **Case-by-case assessment and the environment:** Mandatory, independent and interdisciplinary case-by-case risk assessment according to the current state of science, with substantial involvement of environmental-science expertise and under realistic conditions of the receiving environment – taking into account persistence, spread, horizontal gene transfer, effects on microbiomes and non-target organisms, cumulative effects and scale. Blanket exemptions from the assessment of relevant environmental effects must be ruled out.
- **Detectability and traceability:** Reliable detectability and traceability as a condition for authorisation.
- **Monitoring:** Mandatory long-term monitoring for all GMM releases. The monitoring measures required are to be determined on the basis of the case-by-case risk assessment.
- **Authorisations:** Time-limited authorisations and regular reassessment. Authorisations of unlimited duration – even if granted only after the first renewal – are incompatible with risk management that is capable of learning.
- **Liability and safety:** Liability, insurance and emergency and remediation plans must be settled before release. Ex-post liability cannot replace ex-ante precaution.
- **Thresholds:** No extension of the scientifically insufficiently substantiated approach of classifying GMOs as low-risk on the basis of blanket numerical thresholds. What is decisive for potential risks is the nature, function and context of genetic modifications – not their mere number.
- **Burden of proof and standard of assessment:** Whoever releases bears the burden of proof – a lack of knowledge is not an indication of the absence of risk (Cartagena Protocol, Annex III). The case-by-case assessment must capture the entire pathway of effects and dispersal of an application – for instance from the soil via plant and flower to the pollinator, not just the site of application –, state which effects it was able to detect with what probability, and build on a documented baseline of the receiving environment. A negative finding without this information is not proof of safety.

1 QPS (Qualified Presumption of Safety) is a procedure developed by the European Food Safety Authority (EFSA) for the safety assessment of microorganisms in the food and feed sector. It evaluates taxonomic units on the basis of existing knowledge and defined safety criteria but, in EFSA's own assessment, cannot replace an environmental risk assessment.

1. The conceptual fallacy: static categories for dynamic microbe–environment interactions

The Commission proposal COM(2025) 1031 provides, among other things, for a "low-risk" category, reduced information requirements, the possibility of waiving environmental monitoring, adapted detection requirements and authorisations of unlimited duration. The Council has altered individual points: it now refers to the former "low-risk" category as "GMMs eligible for an expedited procedure" and leaves the first authorisation time-limited. The underlying logic, however, remains in place: certain GMMs can enter an expedited procedure on the basis of, among other things, their QPS status, in which information requirements are reduced and monitoring can be dispensed with in certain cases.[1][2]

These adjustments by the Council improve individual details but do not solve the fundamental scientific problem: a predefined, static category cannot vouch for the ecological safety of a specific, dynamic and open application. Generic safety assumptions based on QPS – the Qualified Presumption of Safety developed by EFSA for the food and feed sector – do not capture environmental risks posed by GMMs; these must be assessed product-specifically in the individual case. An expedited procedure must not lead to less care in the assessment.[2][4][18]

A recent briefing on the reform, commissioned by the European Parliament's Committee on the Environment, Climate and Food Safety (ENVI), likewise concedes that enshrining QPS in legislation raises legitimate concerns insofar as generalised safety assumptions could replace an individualised, case-specific environmental risk assessment – particularly in new or insufficiently understood ecological contexts. The briefing further points out that waiving environmental monitoring may impair the detection of long-term, cumulative or ecosystem-specific effects and regulatory learning.[17]. What matters, therefore, is not merely that a risk assessment formally remains in place, but whether its data and monitoring requirements allow a robust judgement of the specific environmental effects.

In addition, QPS was developed solely for the safety assessment of microorganisms in the food and feed sector; for the assessment of open environmental applications, by contrast, the conditions of the respective receiving environment must be decisive. Nor does the additional criterion of "genes of concern" clearly captures genetic functions with potential environmental effects. [18]

A concrete example shows the limits of such safety assumptions: *Bacillus amyloliquefaciens* is among the microorganisms with QPS status. Wang et al. (2022) increased the antifungal activity of strain WH1 against *Fusarium oxysporum* by 53 % through four deletions of endogenous regulatory and metabolic genes. No additional gene had to be introduced. [19] In the environment, the increased antifungal activity may also affect non-target fungi and, thus, microbial communities and ecological functions.

The example clearly demonstrates the conceptual weakness of the proposed approach: QPS status and "genes of concern" are not sufficient criteria for justifying, in advance, reduced assessment requirements for a genetically modified microorganism in the environment.

AI-assisted genome editing broadens and accelerates the possibilities for developing microorganisms with novel biological properties. This also exacerbates the problem of blanket "low-risk" categories: neither the safety history of the parent species nor the absence of known "genes of concern" is sufficient to judge the environmental effects of such modifications.[18][30]

The problem extends beyond the expedited procedure. For all GMMs, the proposal provides information requirements to be adapted to the respective characteristics of the GMM or product; according to the Staff Working Document (SWD), this can lead to reduced data requirements. The SWD explicitly describes certain categories in which the assessment of the potential for horizontal gene transfer may be omitted depending on the type of genetic modification and the resulting trait – for example in the case of self-cloning, targeted DNA changes or deletions.[4]

Additional relief is envisaged for GMMs in the expedited procedure. In the view of the VDW, however, such an adaptation must not result in environmental questions relevant to open applications remaining unexamined – in particular persistence, spread, horizontal gene transfer and interactions with microbiomes and non-target organisms. Which data are required must follow from an open-ended case-by-case risk assessment that includes interactions with the environment.[1][4] Individual amendments in Parliament go further and seek to remove microorganisms produced with the techniques listed in Annex II, Part A of Directive 2009/41/EC from the scope of Directive 2001/18/EC altogether (AM 202, 203).[31]

This would not ease the requirements for the categories criticised here but exempt them from release assessment entirely.

Article 4(3) of Directive 2001/18/EC already requires a case-by-case assessment of potential adverse effects arising from gene transfer, taking into account the organism concerned and the receiving environment.[20]

Annex III of the Cartagena Protocol likewise provides for a case-by-case risk assessment whose information requirements depend on the organism, its use and the receiving environment. A lack of knowledge must not simply be taken as an indication of the absence of risk or of an acceptable risk.[21]

The extent of this missing knowledge can be quantified. In the most comprehensive catalogue of terrestrial soil metagenomes to date, 78.4 per cent of the genome groups distinguished at species level belong to species not yet described.[22] Of the 511 phylotypes that on global average account for 41 per cent of all bacterial 16S rRNA gene sequences in soil, fewer than 30 per cent have a type strain on which their physiology could be examined at all.[23] Soil – home, according to current knowledge, to around 59 per cent of all species on Earth, with an uncertainty the authors put at ± 15 percentage points –[24] is thus among the least inventoried habitats on the planet. These figures are not an argument against assessment; they define its reach: generic safety assumptions such as QPS refer to the organism introduced; they say nothing about the system into which it enters.

2. Microorganisms are networked, mobile and barely retrievable

In the points relevant to risk, microorganisms differ fundamentally from chemical substances and from higher organisms such as plants and animals. They often have very short generation times, can evolve, and can be dispersed by water, air, host organisms or other organisms. In many microorganisms – bacteria and archaea in particular – horizontal gene transfer also has an important role. Plasmids, transposons and other mobile genetic elements can spread functional traits across strain and species boundaries. The ecological impact of such transfers depends on the receiving environment, selection conditions and interactions with different microbiomes. A risk assessment that considers only the genetically engineered organism itself, independently of its environmental context, remains incomplete.[6][7]

Nor is a genetically engineered restriction of the capacity to replicate or spread sufficient proof of safety. In 2026, the Netherlands Commission on Genetic Modification (COGEM) pointed out, with regard to genetically modified viral vectors in clinical applications, that dispersal properties can be restored by, among other things, compensatory or restorative mutations, recombination with wild-type or related viruses, and complementation. Replication competence may, moreover, depend on the host or vector. COGEM therefore rejects a generic exemption of such vectors from environmental risk assessment. "Replication-deficient" must not be equated with "unable to spread" or "safe" without examining the conditions for recombination, complementation and host interaction.[15]

The planetary microbiome analysis of 85,604 metagenomes published in 2026 shows that microbial generalists can bridge ecological boundaries and mediate gene flow between very different habitats. It refutes the assumption that habitat or taxonomic boundaries are reliable biological barriers. A clinical study likewise published in 2026 makes the mechanics of horizontal gene transfer tangible: plasmid-borne resistance genes were transferred within patients from transiently occurring bacteria to established pathogens, where they abruptly generated extreme antibiotic resistance. For the planned regulation of GMMs this is a warning signal: mobile genetic elements can spontaneously cross biological system boundaries and transfer functionally problematic traits.[7][8]

Applications that alter central biogeochemical cycles are particularly sensitive. Nitrogen-fixing soil GMMs, for example, are intended to shift nutrient flows in favour of the crop plant. Yet, the nitrogen cycle, the soil microbiome, plant physiology and the exposures of pollinators and other herbivores mediated through them are coupled and finely attuned to one another. An intervention that appears unproblematic or desirable at the molecular or organismal level in the laboratory can, at the system level, alter selection, competition, community composition or material flows in the environment. A soil pathway that initially appears unproblematic can thus turn into a problematic plant and pollinator

pathway. This is not an argument against an application, but for the mandatory examination of precisely these chains of effects before release and market introduction.[6]

The objection that microbial communities are functionally redundant and buffer such shifts does not hold precisely here: for the "narrow" functions of nitrogen, phosphorus, potassium, sulphur and iron metabolism, functional diversity depends considerably more strongly on taxonomic diversity than it does for broad metabolic functions; nitrification and nitrogen fixation are carried out by a few, in part monophyletic, groups.[25] Applications that deliberately shift nutrient flows intervene at the least buffered point of the system. The redundancy argument supports the expectation of buffering in carbon mineralisation, but not in the nitrogen cycle.

3. The bottom-up fallacy: genomic criteria are not a sufficient measure of ecological safety

In its safety assumption, the proposed regulatory approach relies too heavily on molecular characteristics of the genetically unmodified parent organism, on organism properties known so far, and on results obtained under standardised and controlled test conditions. In the open environment, however, microorganisms do not live in isolation but in communities whose members functionally influence one another. The properties of a strain observed under laboratory and other controlled test conditions therefore cannot simply be transferred to its behaviour in open ecosystems. Complex and feedback-driven interactions within biotic communities: competition and cooperation, host switching, trophic relationships, gene flow, seasonal dynamics, soil and climatic conditions, population density and the scale of use are of real relevance.

Exposure nodes such as pollinators, for example, must be taken into account. They move across large areas and connect soil, flowers, plant surfaces, water sources and different microbiomes. For GMMs that can reach flowers, possible further dispersal by pollinators beyond the area of application must therefore also be considered case by case. The site of application alone does not delimit the space of effects and dispersal to be considered.

For honeybees, it has been shown that their flower visits carry bee-associated bacteria as far as the developing seeds and alter the composition of the seed microbiota; the findings point to an influence of visitation intensity.[26] Soil, plant, flower, pollinator and seed thus form a coupled cycle in which pollinators are both target of exposure and vector of dispersal. The bees' gut microbiome – a conserved, host-specific community involved in pollen digestion, immune function and pathogen defence [27] – is in itself a distinct subject of assessment.

For GMMs used as biofertilisers or biocontrol agents, or applied to plants or pollinators, direct and indirect effects on pollinating insects and other non-target organisms must therefore be assessed as well. This includes changes in food, microbiomes, immune functions and interactions with further stressors. Controlled test conditions, by contrast, reflect the dynamics of open ecosystems only to a limited extent.[6][16]

A statistically non-significant finding does not, in itself, demonstrate safety; its informative value also depends on which ecologically relevant effects the test design was able to detect, and with what probability.

Given the high spatial and temporal variability of microbial communities, conventional test designs often detect effects only above a magnitude that is already ecologically relevant. For environmental endpoints, it must therefore be stated which effect size a design would have been able to detect, and with what probability. A negative finding without this information and without a suitable baseline for comparison is a statement about the measurement procedure, not about the safety of the application.

Alongside statistical power comes the reference point: monitoring presupposes a documented baseline, and standardised time series for the microbial communities of the intended receiving environments do not yet exist. The permanent soil monitoring programmes of Germany's federal and state governments should therefore be extended by standardised metabarcoding and metagenome time series, and untreated reference plots should be made part of the authorisation – not left to accompanying research after the fact. Without a baseline, any monitoring effort remains a measurement without a yardstick.

Likewise, the rapid scaling of new biotechnological applications sought by the Biotech Act changes the potential for environmental risk. A trial on a few hectares is not ecologically the same as an application on hundreds of thousands of hectares. With area, duration and repetition, exposure, population sizes, selection pressure, the probability of spread and the chance of rare events all change. The extent, duration and repetition of the intended application must therefore be part of the case-by-case risk assessment. The cumulative consequences of the large-scale, parallel introduction of numerous GMM applications moreover require an assessment that goes beyond the individual case.

The spatial discrepancy in scale is compounded by a temporal one: humus dynamics, the succession of soil food webs and shifts in nutrient cycles unfold over decades; test designs typically cover one to three growing seasons at a few sites. This discrepancy cannot be remedied by better analytics, but only by a different test design and mandatory long-term monitoring.

4. Authorisations of unlimited duration are scientifically indefensible

The unlimited validity of authorisations envisaged in the Commission proposal, and the validity that is in principle unlimited after the first renewal as envisaged in the Council mandate, are to be rejected in the view of the VDW. Precisely with living, evolving and potentially persistent organisms, relevant findings often emerge only through prolonged use: on spread, interactions with the environment, new detection methods and changed exposure situations. An unlimited authorisation without regular reassessment deprives regulation of its necessary capacity to learn and makes systematic adaptation to the current state of science, as well as timely regulatory countermeasures, more difficult or impossible.[1][2]

In 2026, the Leopoldina set out the same regulatory principle with regard to the parallel proposal to remove time limits for active substances in plant protection products: time limits and regular reassessment are elements of a regulatory system capable of learning, one that systematically integrates new data and refined assessment methods.[12] For evolutionarily highly dynamic microorganisms this argument carries particular weight, because they can pass on and take up genetic material – and thus traits – horizontally and, once established in the environment, are barely retrievable.

The authorities' powers to intervene when there is cause to do so cannot replace periodic reassessment, which is an essential element of a regulatory system capable of learning.[12] They presuppose that new risks are reliably detected in the first place. Precisely this is not ensured if, at the same time, environmental monitoring is to be dispensed with and analytical detection requirements relaxed; the ENVI briefing itself points out that reduced monitoring can make it harder to establish the causation required for liability and remediation measures.[17]

5. Lessons from new genomic techniques (NGT) in plants – a warning for animals

Regulation (EU) 2026/1388, adopted in 2026, on plants obtained by certain so-called "new" genomic techniques – hereinafter the NGT Plants Regulation – already exhibits the same methodological error: category 1 plants are largely treated like conventionally bred plants and exempted from central GMO protective mechanisms if formal equivalence criteria are met. Annex I works, among other things, with limits of at most 20 nucleotides for certain substitutions or insertions, at most three genetic modifications per protein-coding sequence and, in total, at most 20 modifications per monoploid genome. What is decisive, however, is the location, nature and functional effect of the modification, and the ecological context in which it takes effect.[9]

A peer-reviewed proof of principle published in 2025 demonstrated that generative AI could be used to design an insecticidal NGT maize that was intended to meet the category 1 criteria of the Commission proposal as they then stood. The final version of the Regulation now expressly excludes plants with the intended trait "production of a known insecticidal substance" – as well as herbicide tolerance – from category 1. This is an important correction. At the same time, the example shows the weakness of formal thresholds: what is relevant for ecological impact are the biological properties and effects of the

modification – including unintended effects. A numerical limit is no substitute for a case-by-case environmental risk assessment.[9][10]

The VDW therefore considers the lowering of central protective, labelling and precautionary mechanisms for category 1 NGT plants to be potentially dangerous and scientifically inadequately substantiated. As a safety limit, numerical thresholds are arbitrary: no biological threshold for harmful effects follows from the number of genetic modifications. The very logic of categorising modifications by the type or number of genetic interventions fails to do justice to the biological complexity of their effects. The VDW expressly warns against transferring this logic to genetically modified microorganisms and animals in future. There, environmental effects are determined by, among other things, mobility, reproduction, gene flow, interspecific competition, disease transmission and invasiveness. A comparable category 1 regime for animals does not currently exist; here, the VDW issues a precautionary warning. Case-by-case assessment must be retained for animals too.

6. Good risk policy requires good procedures

By virtue of its origins, the Federation of German Scientists (VDW) stands for the social responsibility of science. Interdisciplinary expertise, critically reflective public debate and the democratic quality of political procedures are central to this. The VDW advocates a science oriented towards the interests of society, one that does not follow one-sided, primarily economic rationales for scientific work. This responsibility also extends to sustainable agriculture and food systems: sustainability there requires ecological principles and systemic approaches rather than a focus on individual technologies.[11][13]

Against this background, the VDW criticises the fact that the amendment of the GMM Directive was not prepared by a regular impact assessment. The Commission justified this with political urgency; an analytical Staff Working Document followed only on 26 May 2026. For the GMM impact analysis, it cites 25 interviews: 13 with private companies, five with public authorities, one with an EU agency, five with business associations and only one with a non-governmental organisation. No dedicated public consultation on the release of GMMs is reported.[1][4] The thrust of this urgency is economic policy, and the Commission proposal states it with unusual candour: the adaptation is meant to make it possible to bring innovative products to market "before they become obsolete".[1] At the same time, for many new GMM applications robust independent data on efficacy and environmental behaviour under real field conditions are lacking. Regulatory relief must not be based on developers' expectations or on laboratory and pilot data as long as these assumptions have not been independently verified under realistic conditions.

Added to this is a bundling that is hard to justify on the merits: the amendment of the law on the release of GMOs was combined with rules on the processing of organs for transplantation. In the Council, the text was discussed by the Working Party on Pharmaceuticals and Medical Devices; the general approach was adopted by the EPSCO Council in its Health configuration – not by the Environment Council. In Parliament, ENVI and SANT are now jointly responsible. This does not, however, remedy the deficits of the preparatory phase.[2][3] No regular impact assessment – and hence no scrutiny by the Regulatory Scrutiny Board – took place; several background studies relied on by the Commission were still listed as "forthcoming" when the SWD was published.

Ignorance is not a neutral quantity. A risk that lies below an assessment can detect is not accounted for as a risk but externalised – onto soils, waters and pollinators, and onto those who bear the consequences. The magnitude of this mechanism has been quantified: for the primary production and primary processing sectors alone, the study commissioned by the TEEB for Business Coalition estimates unpriced natural capital costs of around 7.3 trillion US dollars – for the reference year 2009, roughly 13 per cent of global economic output.[28] Ecologically, there is no "outside": what drops out of the assessment does not drop out of the world; it is absorbed by the foundations of life – with all the consequences that follow. The benefit of a release accrues privately and promptly; the risks fall on the general public, displaced in space and time.

The historical record of such trade-offs is unambiguous. In its collection of case studies "Late lessons from early warnings", the European Environment Agency has shown that cases of precaution omitted despite available warnings vastly outnumber precautionary measures triggered in error, which

are rare – and that carefully designed precaution tends to stimulate innovation rather than hinder it.[29] The argument that precautionary requirements slow down biotechnological development is not borne out empirically. From this follows the burden-of-proof rule: whoever releases must provide the scientifically robust basis for assessing potential adverse effects in the specific receiving environment that Article 4(3) of Directive 2001/18/EC requires.[20] The absence of evidence of harm does not replace this basis. Where it structurally cannot be established, the reach of the intervention must be limited in space and time.

For potentially persistent organisms that cannot be reliably retrieved, procedural quality is part of risk precaution. The VDW therefore considers any blanket lowering of assessment, monitoring, detection or reassessment requirements for open GMM applications to be dangerous and rejects it: no blanket presumption of safety, no authorisations of unlimited duration, no release without robust detectability, monitoring and an independent, interdisciplinary case-by-case assessment in the specific receiving environment. The legal framework must follow ecological reality – not the logic of accelerated biotech markets, which would moreover operate without an adequate liability framework.

The scientific preparation for environmental releases also remains incomplete: an EFSA opinion of 2024 did include environmental releases; the relevant EFSA guidance of 2025, however, concerns products in the food chain, and specific guidance for GMMs intended for release is still lacking.[5] [14]

Moreover, for open GMM applications there are at present no sufficiently developed assessment and monitoring methods for long-term, interaction and combination effects. [18] To judge changes, monitoring also needs a suitable baseline for the state of the receiving environment without the GMM application in question. Establishing that baseline is particularly demanding for dynamic microbial communities.[6] Without validated detection and identification methods, moreover, monitoring, traceability, liability and effective emergency measures are not reliably possible. Documentation-based traceability cannot replace analytical detectability in open environmental applications: it documents the intended production and application pathways, but does not allow independent detection of unintended spread, persistence or inputs outside these pathways. [17]

7. Acceleration without lowering standards – a shared position

The VDW does not oppose swift procedures. Acceleration is possible where it leaves the informative value of the assessment and the effectiveness of monitoring untouched – through clear deadlines, bundled procedural steps and pre-submission consultations, not through dispensing with safety-relevant data. Different applications may justify different depths of assessment; the depth of assessment must, however, be the outcome of the expert case-by-case evaluation and not follow wholesale from a starting assumption. Preserving due care does not make innovation impossible; it makes it reliable.

These requirements are not a special path taken by the VDW. The Ecological Society of Germany, Austria and Switzerland (GfÖ) calls for case-specific risk assessments and mandatory long-term monitoring;[30] the German Federal Agency for Nature Conservation (BfN) considers the general classification of GMMs as low-risk unsuitable from an environmental perspective and warns that the draft hampers the generation of information that is indispensable for effective protection;[18] the Leopoldina identifies – for the authorisation of active substances in plant protection products – time limits and regular reassessment as elements of a regulatory system capable of learning;[12] for clinical trials, the Netherlands Commission on Genetic Modification (COGEM) rejects the proposed generic exemptions from environmental risk assessment.[15]

The VDW invites scientific societies, environmental and nature conservation organisations, and the actors of agriculture and the food sector to support this position. This is not about a verdict on a technology, but about the conditions under which interventions are made in the biotic communities on which soil fertility, food and health depend. In the European Parliament, individual elements of these requirements are reflected in amendments tabled by Members from different political groups – case-by-case assessment in the specific receiving environment, mandatory monitoring for every GMM, validated detection methods as a condition for authorisation, and time-limited authorisations.[31]

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