

Mr Czesław Siekierski  
Minister of Agriculture and Rural Development  
ul. Wspólna 30  
PL-00-930 Warszawa  
By email only

Brussels, 18 January 2025

## **Flawed compromise proposal on GMO deregulation**

Dear Minister,

We are writing to express our concern about the latest compromise proposal, issued by your ministry on 7 January 2025, concerning the deregulation of genetically modified (GM) plants created using so-called ‘new genomic techniques’ (NGTs).

The proposed compromise fails to address key regulatory gaps introduced by this draft law. For the majority of new GMOs (so-called category 1) it fails to provide transparency about their presence to consumers, food producers and traders throughout the production and distribution chain. It does not mandate any detection and identification methods, nor does it provide for effective rules to prevent contamination of GMO-free seeds, harvests and food. Further, the proposal does not provide sufficient safeguards to protect human health and the environment from the potential risks associated with GM plants. Finally, despite positive intentions, it does not effectively address the negative impacts of plant patents on farmers and seed breeders.

In fact, your proposals to mandate the labelling of patented GM seeds and allow EU Member States to ban them in all or part of their territory fail to resolve the core issue: the concentration of seed market power in the hands of patent holders. By placing the responsibility to protect against the unintended use of patented seeds solely on individual Member States, the proposal undermines the collective efforts needed to address this challenge. Additionally, the proposal introduces legal uncertainty by placing certain conditions on some patented seeds but not on others, including those derived from random mutagenesis. This constitutes poor lawmaking and creates uncertainty at a time when strong action is needed to prevent the privatization of genetic resources by multinational seed companies.

We are especially disappointed given that the Polish government, until recently, supported farmers, seed producers, and consumers seeking to avoid GMOs. Just over a year ago, you advocated for consumer labelling and traceability “*from operator to operator until the final consumer*” (Council document 16250/23 ADD 1, [public](#)). Together with Austria, Hungary, Romania and Slovakia, you also insisted that the proposal include “*assurances ... that patents will not increase market concentration, will not have a negative effect on small breeders and farmers and will not restrict their access to genetic resources*” (Council document 16033/2023, [public](#)). However, the current proposal fails to provide these critical assurances.

Regrettably, you now seem to be prepared to undermine consumer trust and weaken the ability of farmers and food producers — including those in the organic sector — to provide the GMO-free food that consumers demand.

Despite the proposed changes, the draft law remains incompatible with core EU principles of health and environmental protection as well as farmers’ and consumers’ rights.

We respectfully urge you, Minister, to amend this proposal and defend the EU model of farming by making sure our EU legislation protects farmers and breeders against patented GM seeds and allows consumers to choose GMO-free food.

Sincerely,



Benedikt Haerlin, Director of Save Our Seeds

On behalf of

- Aegilops (Greece)
- Agrolink (Bulgaria)
- AgroCert s.r.o. (Slovakia)
- Arbeitsgemeinschaft bäuerliche Landwirtschaft (Germany)
- Arche Noah (Austria)
- BUND Naturschutz in Bavaria (Germany)
- Centrum pre trvaloudržateľné alternatívy (Slovakia)
- Corporate Europe Observatory
- Demeter Belgium
- Demeter Czechia and Slovakia

- Druživa, o.z. (Slovakia)
- EKOTREND - Zväz ekologického poľnohospodárstva (Slovakia)
- European Consortium for Organic Plant Breeding – Eco-PB
- Friends of the Earth Europe
- Greenpeace
- IG Saatgut (Germany)
- Instytut Spraw Obywatelskich (Poland)
- Nature & Progrès (Belgium)
- Noah - Friends of the Earth Denmark
- Občianska iniciatíva Slovensko bez GMO (Slovakia)
- OGM dangers (France)
- OZ Vidiecky parlament na Slovensku – VIPA (Slovakia)
- Plataforma Transgenicos Fora (Portugal)
- Priatel'ia Zeme – SPZ – Friends of the Earth Slovakia
- Save Our Seeds (Germany)
- SITO Seeds (Greece)
- Slowfood
- Stichting Zaadgoed (Netherlands)
- Vidiecka platforma (Slovakia)
- Zväz výrobcov krmív, skladovateľov a obchodných spoločností (Slovakia)