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# JOINT STATEMENT ON THE DEREGULATION OF NEW GMOS

**Protect the business of small and medium size breeders,  
farmers, and the organic and non GMO sectors in the EU**

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**11<sup>TH</sup> FEBRUARY 2025**

European countries are discussing a new far-reaching legal proposal on genetically modified organisms (GMOs). It covers genetically modified (GM) crops and wild plants produced with new gene editing techniques (NGTs). These GMO plants are also known as “new GMOs” or “NGT-GMOs”, and will mostly be covered by patents, as are “old GMOs”. The proposal will increase the control that a handful of companies exert on farmers, and restrict the freedom of circulation of genetic material for breeders and farmers. It poses a serious threat to the business of European small- and medium-size breeders and farmers, and to the organic and GMO-free sectors.

The proposed law excludes new GMOs from the existing EU GMO legislation. In particular it excludes [most of them](#) from being checked for safety, allowing their deliberate release into nature and their presence in the food chain without any assessment of the risks this could pose for nature or human health. The proposal also excludes most new GMOs from being monitored after release, which is necessary in case problems arise for consumers or nature that were not picked up during the risk assessment.

[Independent scientists](#) and national agencies from [France](#), [Germany](#) and [Austria](#), are warning that new GMOs could pose risks to nature (i.e. modified interactions with pollinators) and human health (i.e. allergenicity or toxicity). The proposal will also remove freedom of choice for producers and citizens because most new GMOs will no longer be traceable (tracked) and labelled in food products.

This deregulation of new GMOs will have significant socio-economic impacts on farmers, breeders and other actors in the food chain but these will not be considered in a risk assessment as they should.

Deregulating new GMOs will cause problems for farmers and breeders, as explained in the annex below. These problems include biopiracy with privatisation of seeds (life), increased risk of lawsuits against farmers and breeders by the patent industry because of patent infringement claims, administrative burden due to legal uncertainty ([constant legal vigilance](#)), increased production costs, risk of losing their business, reduced seed variety (agrodiversity) - which is needed by farmers to adapt to the effects of climate change - and increased vulnerability to pests and diseases. The proposal is also a threat to farmers' existing rights to save, use, re-use and exchange their seeds ([farmers' rights on seeds](#)) and to [small and medium breeders](#), and could also [breach the rights of organic and GM-free farmers](#).

Sustainability promises of new GM plants are hypothetical given that [very few new GMOs have reached the market](#) in the last decade. Amongst the new GMOs that have

reached the market, there are already examples of [market failures](#). When it comes to the benefits to society, such as adaptation to climate change with increased resistance to drought, i.e. to water scarcity, research has been ongoing for longtime with old and new GMOs, with [no success so far](#). On the other hand, selection carried out by farmers in their fields and by small- and medium-size breeders [already offers adaptation to stresses such as drought \(which is expected to increase as the climate warms\)](#) and solutions adapted to specific local farming conditions and farming systems. For example, knowledge-intensive organic breeding programs [offer successful, innovative varieties](#) with more resilient crops adapted to the [principles](#) and specific conditions of organic farming.

A product or an agriculture production system cannot be declared “sustainable” solely based on a given plant variety or on a trait (plant characteristic). Furthermore much of the ongoing research with NGT-GMOs is not intended to achieve sustainability or to bring benefits to society but is [consumption or industry oriented](#) (p.3), for example, [pink pineapples](#).

**The signing organisations representing European farmers and small and medium size breeders, the food sector and civil society are deeply worried by the attempts to rush an agreement in the Council and negotiations between the Council and the Parliament in light of the potential risks of new GMOs for human health and nature and of the many outstanding unresolved issues on the table, i.e. patents, identification and detection methods, price of seeds, seed diversity, coexistence, negative socioeconomic impacts and risk of further corporate control of the food chain. We are very worried that the solutions proposed by the European Parliament and the Belgian and Polish Council Presidencies on patents are not solving the patent problem (see point 1.1 in annex).**

**We call on European countries to protect their farmers and breeders, as well as citizens and nature. All new GMOs must remain covered by an assessment of the risks and monitoring, identification and detection methods, and traceability and labelling along the food chain. Countries must be able to ban or restrict their cultivation in their territory.**

**We call on European countries to stop the de-regulation of new GM plants.**

## DAMAGING EFFECTS THE DEREGULATION OF NEW GMOS WOULD HAVE FOR EU FARMERS AND SMALL- AND MEDIUM-SIZE BREEDERS, THE ORGANIC AND GMO-FREE SECTORS, AND THE EU'S FOOD CHAIN

- 1\_ Patents on life leading to biopiracy.
- 2\_ Increased legal uncertainty for breeders and farmers and increased risk of lawsuits against them, putting their business in danger.
- 3\_ Threat to the viability and existence of the organic and GMO free economic sectors.
- 4\_ Irreversible increase of farmers' dependence on few seed companies with expected increase in their production costs.
- 5\_ Less seed diversity adapted to local conditions and climate change and risks to food security.
- 6\_ Likely increase of the EU's food chain vulnerability.

### 1\_ PATENTS ON LIFE LEADING TO BIOPIRACY

Claiming patents on living organisms poses serious ethical questions because life is not a human invention. What's more, these so-called "inventions" for which patents are claimed are often [based on already existing genetic material](#) that is collected from nature or from farmers' fields, without their free and informed consent nor compensation or sharing of the benefits obtained via the patent.

European patent law allows private companies to claim a [patent](#) both on the techniques used to obtain a plant (i.e. new gene editing techniques or NGTs) and on the plant products and genetic information resulting from these techniques. This means that patents can extend to traits and genetic material that are [present in plants obtained via conventional breeding](#) (non genetically engineered), or that exist in nature.

In this way, private companies privatise genetic resources that do not belong to them (biopiracy), and that [breeders](#) and [farmers](#) can now use and re-use under certain conditions.

Detection and identification methods for new GMOs are an essential way to protect farmers against this abusive extension of the scope of patents that could otherwise become more widespread because of the lack of transparency (see point 2.3).

[International treaties](#) (art. 19 and art. 21) recognise farmers' right to seeds, i.e. the right to save, use, re-use, exchange and sell their seeds.

#### 1.1. FALSE SOLUTIONS

The [European Parliament](#) and [Council](#) recognise the importance of the patent problem yet the solutions they propose will not solve the issue. According to a [legal study](#) from December 2024, the European Parliament's demand to exclude plants modified by new genetic technologies (NGT) from patentability (p. 10) violates the provisions of the European Patent Convention (EPC). Banning patents on new GMOs needs to be done via the EPC (p. 34), which also involves non-EU members.

In 2024, the Belgian Council Presidency presented a compromise proposal, according to which new GMOs can only benefit from full deregulation under the Commission

proposal (no risk assessment, monitoring, identification and detection, traceability or labelling) [if they are not patented](#) (p.11). This, however, may violate the [principle of proportionality](#) of EU law (p.41).

In January 2025, the [Polish presidency put forward a revised proposal](#) based on the Belgian text, but this also [does not provide a solution](#). There would still be [an increased concentration of the seed sector](#) in the hands of just a few big companies. This concentration would be detrimental for the European small and medium breeding sector; increase the dependence of farmers on those few companies; increase the vulnerability of our food chain; and will likely lead to less seed diversity adapted to local farming conditions and to climate change (see points 4, 5 and 6).

Moreover, when it comes to the Belgian and Polish Presidency proposals, without the much-needed identification and detection methods for all new GMOs, it will not be possible to enforce the law and prevent fraud. Detection and identification methods are feasible [according to experts](#) (see points 2.3 and 2.4).

## **2\_ INCREASED LEGAL UNCERTAINTY FOR BREEDERS AND FARMERS AND INCREASED RISK OF LAWSUITS AGAINST THEM, PUTTING THEIR BUSINESS IN DANGER**

### **2.1. BREEDERS**

The European Union is home to a very rich and vibrant sector of [around 7 000 breeding companies, employing around 52 000 people](#). European breeders can now use conventionally bred seed and reproductive material (i.e. tubers, cuttings, young plants), known as the [breeders' privilege](#).

As a result of biopiracy, the seed company that owns the patent can bring breeders to court claiming that they (small and medium size breeders) are using seeds and material that belong to it (the company). Breeders that have invested time and money to develop a new seed or reproductive material [can lose all of their hard-earned work](#). Breeders can also lose access to genetic resources that they need to do their work (breeders' privilege). With reduced access to biological diversity, it will be more difficult for them to develop climate resilient, locally-adapted crops and innovation will decrease in the EU. Breeders will likely see their [costs and workload](#) increase, because they will need to do thorough checks on what material belongs to the patent industry to prevent, as much as possible, legal problems. They might also lack the means to hire a lawyer in case of a lawsuit. This is already an issue for many breeders that face the costly and time-consuming task of asking a laboratory to do a [sequencing](#) of the genetic material (DNA) of all of their plants to make sure that the patented trait is not included in their varieties.

### **2.2. FARMERS**

Biopiracy and lawsuits are also a threat to small- and medium-size farmers because many are doing on-farm plant breeding - a traditional selection of new plant varieties - and using their own farmers' seeds, which are well adapted to their needs (cultivation conditions in their farms). In case of lawsuits, farmers may lose the right to use and re-use their own seeds. This would increase their production costs since they would

have no other choice than to buy GMO-seeds, and they would lose access to seeds adapted to their cultivation conditions. Organic and GMO-free farmers can also be sued if their crops are accidentally contaminated with gene edited material (See point 3).

### **2.3. NO DETECTION AND TRACEABILITY**

With the proposal there will no longer be the obligation to publish methods to identify and detect the new GMO plants and most of them will have no traceability, i.e., they will not be tracked after being released in farmlands or nature.

No traceability means that it will become more difficult if not impossible for breeders and farmers to know where the material they use comes from and thus make sure it is not patented.

Without traceability and detection and identification methods, it will be impossible for [farmers and breeders to prove](#), if they are sued, [that the material they use is not patented](#). Farmers do not have the technical means to do a sequencing of the genetic material (DNA) of their seeds needed to prove that these are obtained via conventional breeding, and not via gene editing, which is why they need identification and detection methods. In case of infringement proceedings, it will therefore be impossible for farmers to prove that they did not use patented material in case of contamination or privatisation of their seeds (reversed burden of proof, that should normally fall on the owner of the patented product causing the damage). Furthermore, their seeds and harvests [may be seized \(p. 15\) during the duration of the lawsuit, and may be destroyed in the event of a conviction](#) (p. 21). For many farmers and small breeders, this would be an economic burden from which they might not be able to recover financially. In the long-term, farmers might have no other choice than to buy patented genetically-modified seeds every year, to avoid potential infringement lawsuits.

The new GMO deregulation proposal allows private companies with substantial economic resources to be absolved of the responsibility for the damages their products might cause to health or the environment. Instead, this responsibility will fall on European farmers and breeders, who will be unable to prove that they are not the cause of such damage, while their crops and the derived products may be destroyed, and they may be heavily fined for damage compensation.

### **2.4. FALSE SOLUTIONS**

In the existing GMO legislation, the owner of the GM plant is obliged to publish the detection method and all GMOs are subject to traceability.

The new GMO legislative proposal and the [Polish Presidency compromise](#) proposal, - which are currently under discussion by European Countries to reach a political agreement on the text - are based on the [contested idea that new GMOs cannot be detected and identified](#) because there would be no technical methods to do so. Yet, two ongoing EU-funded research programmes, [Darwin](#) and [Detective](#), are working to establish identification and detection methods for new GMOs. With its legislative proposal the Commission is putting the cart before the horse, while it would only be logical to [wait for the results of these research projects](#).

### **3\_ THREAT TO THE VIABILITY AND EXISTENCE OF THE ORGANIC AND GMO FREE ECONOMIC SECTORS**

The proposed law [does not provide a clear legal basis and practical tools for the protection of organic and non-GMO farmers and breeders against the contamination](#) of crops with new GMOs. This is so because there is no traceability and legal basis for Member States to take coexistence measures to allow organic and GMO-free farmers to carry on their business, and Member States cannot ban or restrict the cultivation in their territory for most new GMOs.

The proposal could violate organic farmers' [fundamental rights to property and the freedom to run a business](#) (p. 14). By posing a threat to the viability of the European organic farming sector, the proposal is in contradiction with the [European Commission's own objective](#) of achieving 25% of the agricultural land under organic farming by 2030 in order to facilitate the transformation towards a sustainable food system in the EU.

Under the existing GMO legislation countries can define coexistence measures on a national level. These cover the legal right for Member States to draw up certain practical measures to prevent contamination from GMOs. These measures, that may also be crop- and geography-specific (such as separation distances), benefit both GMO and GMO-free farmers, because they reduce the risk of contamination and lower the economic costs associated with it, and the risks of litigation among farmers. The existing GMO legislation also includes the provision to ban and restrict the cultivation of GMOs in their territory, [which 18 countries and regions of Europe already do](#). This measure allows countries to provide protection against contamination and also to decide on the use of their land and on the development of their agricultural policies. Additionally, in the absence of national co-existence measures, organic and GMO-free farmers, breeders and food chain operators may suffer more contamination and might have to bear the costs of cleaning their cultures and products, despite not being responsible for it. In 2014, the [estimated economic losses directly attributed to problems caused by GMO farming](#) rose to as much as €14,756 per organic farmer.

The lack of traceability also makes it difficult for organic and GMO-free farmers and processors and retailers to guarantee that their products are GMO-free and [ensure coexistence along the food chain](#), from operator to operator. Being GMO-free is an essential cornerstone of their business model that will be seriously undermined if it can no longer be guaranteed to be GMO-free.

### **4\_ IRREVERSIBLE INCREASE OF FARMERS' DEPENDENCE ON FEW SEED COMPANIES WITH EXPECTED INCREASE IN THEIR PRODUCTION COSTS**

Small and medium commercial farms are struggling with the low prices paid for their products and [going out of business](#). The new GMO proposal risks making their position in the food chain even more difficult because it [will likely lead to a significant increase in the price of seeds](#) (p. 23). Between 1990 and 2020, according to the [US Department of Agriculture \(USDA\)](#), prices of seeds with genetically modified traits increased by 463%, compared to an increase in non-GMO seeds' prices by around 120%.

The new GMO deregulation will likely [intensify the concentration of the seed industry](#) in the EU (p. 31). [Today, just four companies control over 60% of the seed market worldwide](#): Bayer, DowDupont/Corteva, ChemChina-Syngenta and BASF. These few dominating firms will then be able to exert [more](#) power over farmers' production choices (p. 20). Because of biopiracy and lawsuits, these companies will also increase their power over farmers that can now use and re-use their seeds. Having less autonomy will mean European farmers become more vulnerable to global fluctuations of seed prices.

## **5\_ LESS SEED DIVERSITY ADAPTED TO LOCAL CONDITIONS AND CLIMATE CHANGE AND RISKS TO FOOD SECURITY**

The new GMO proposal will likely lead to [less seed diversity](#) (p. 23). Big seed companies would focus on marketing a few industrial varieties while biopiracy and lawsuits will, at the same time, make it more difficult for the [many farmers who constantly renew agrobiodiversity by breeding, reusing and exchanging their own seeds](#) and many small- and medium-size European breeders to continue to develop a large number of seed varieties adapted to the very different farming conditions across Europe and to climate change.

We need seed diversity in Europe to fit its very [rich and diverse rural landscapes](#) and climate conditions. Less diversity because of increased genetic uniformity would also make farming in Europe [more vulnerable to pests and diseases](#) (p.58) and [to extreme climate events](#).

In the long term, the concentration of genetic resources in the hands of a few large seed companies and the consequent reduction of agrobiodiversity is incompatible with [food sovereignty](#) (that includes the right of peoples to define their own food systems) and [risks posing a threat to global food security](#). Farmers' traditional varieties and so-called landraces (species that are locally-adapted to their environment) and the diversity of seeds currently developed by small- and medium-size European breeders are more resilient than those with little genetic diversity.

## **6\_ LIKELY INCREASE OF THE EU'S FOOD CHAIN VULNERABILITY**

Global commodity markets and corporate-controlled supply chains [have been shaken](#) in the last three years (i.e. Covid pandemic, war in Ukraine). Fertilizer shortages, volatile and spiralling food prices, lost harvests, and empty shelves [have become the new normal](#) (p. 12). We can expect more shocks in the future, which is why it is essential to make our food chain more resilient. The new GMO proposal will further increase corporate capture of our food chain, and corporate controlled supply chains are more concentrated and thus [can be highly vulnerable to shocks](#) (p. 13). The new GMO deregulation therefore risks increasing the vulnerability of our food chain, with negative consequences both for farmers and consumers.

**INITIATORS**

Greenpeace  
Centro Internazionale Crocevia  
European Coordination Via Campesina  
IFOAM Organics Europe  
Nordic Maize Breeding  
POLLINIS

**EU AND INTERNATIONAL ORGANIZATIONS**

Corporate Europe Observatory  
Biodynamic Federation Demeter International  
EuroCoop  
European Consortium for Organic Plant Breeding (ECO-PB)  
Friends of the Earth Europe (FoEE)  
Navdanya International  
Oxfam  
Slow Food

**NATIONAL ORGANIZATIONS****BREEDERS AND BREEDERS' ORGANIZATIONS**

Allkorn  
Apfel:gut e.V.  
Bingenheimer Saatgut AG  
BioSaat GmbH  
Bloem en Oogst  
Dachverband oekologische Pflanzenzüchtung in Deutschland e.V.  
De Beersche Hoeve  
De Bolster  
De Zaderij  
EURGANIC (Dr. Benedikt Haug)  
Fondazione Seminare il Futuro  
Forschung & Züchtung Dottenfelderhof  
Fund for crop development (FKE)  
gzpk (Getreidezüchtung Peter Kunz)  
Initiative for GE-free seeds and breeding  
Keyserlingk-Institut  
KLEINeFARM  
KVANN Norwegian Seed Saver  
Ökologische Tierzucht gGmbH  
Sativa Rheinau AG  
Seed Shepherd  
Sito Seeds  
Stichting Zaadgoed  
Vitale Rassen  
Vivaio il Ruscello

**FARMERS' ORGANIZATIONS**

AGRIKA s.r.o.  
Agrodružstvo Tuchyňa  
AIAB  
AltragricolturaBio

Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL) e.V.  
Asociácia včelárov Slovenska  
Association of Croatian Family Farms  
Associazione per l'Agricoltura Biodinamica  
Associazione per l'agricoltura biodinamica Bolzano-Trento  
Associazione Rurale Italiana  
Associazione Solidarietà Campagna Italiana (ASCI)  
Associazione Veneta Produttori Biologici e Biodinamici (AVeProBi)  
Bio Austria  
BioForum  
Biohuis  
Bioland e.V.  
Bioland Südtirol  
Boerenforum  
Brova, spol. s r.o.  
Caring Farmers  
Confédération Paysanne  
Consorzio della Quarantina  
Demeter Associazione Italia  
Demeter CS  
Demeter Germany  
Eco-Farm Nitra s.r.o.  
EHNE Bizkaia  
Erde & Saat  
ETXALDE Nekazaritza Iraunkorra  
FARMARIA s.r.o.  
Federatie van Agro-ecologische Boeren  
Fédération Nationale d'Agriculture Biologique (FNAB)  
Fédération Nature & Progrès  
Federazione Italiana Agricoltura Biologica e Biodinamica (FederBio)  
Finnish Organic Producer's Alliance (FOPA)  
Foreningen for Biodynamisk Jordbrug  
Foundation Demeter  
GemerProdukt Valice, OVD  
Hrvatski savez udruga ekoloških proizvođača  
Interessengemeinschaft Nachbau  
Junges Bioland e.V.  
La Ruda  
Norsk Bonde – og Småbrukarlag (The Norwegian Farmer and Smallholder Association)  
Northern Greece Organic Farmers Association  
PPD Komjatice  
Samengreisslerei  
SEMA HŠ s.r.o.  
Sindicato de obreros del campo - sindicato andaluz de trabajadores (SOC-SAT)  
Union des Agriculteurs-rices Bio de Wallonie (UNAB)  
Vlaams Agrarisch Centrum  
Zeleninársko potravinárske družstvo (ZPD)

### **FOOD OPERATORS AND RETAILERS**

AssoBio  
Biotatry H&B  
BS Profi s.r.o.  
Bulgarian Organic Foods Ltd  
Bund Ökologische Lebensmittelwirtschaft e.V.  
Bundesverband Naturkost Naturwaren (BNN) e. V.  
Createc msc s.r.o.  
Denofa As  
EcorNaturaSi  
Ekoplaza  
Framipek s.r.o  
Gino Girolomoni Cooperativa Agricola  
Københavns Fødevarefællesskab  
Mäspoma spol. s.r.o  
MoravoSeed Slovakia s.r.o.  
NaNa Bio BV  
Odin Foodcoop  
Open Farm  
Rapunzel Naturkost GmbH  
SYNABIO  
Zväzu výrobcov krmív, skladovateľov a obchodných spoločností

### **CIVIL SOCIETY ORGANIZATIONS**

Aegilops  
Agrárna komora Slovenska  
Amis de la Terre (FoE France)  
ARCHE NOAH  
Arci Nazionale  
Asociación Vida Sana  
Asociatia Mai bine  
Association Quinta das Aguias  
Associazione Verdi Ambiente e Società  
Aucs Aps  
Banya–Tanya Alapítvány  
Beyond GM  
Bioacademy  
Bioconsom'acteurs  
Biologisk–dynamisk Forening Norge  
Biovrt – u skladu s prirodom  
Bond Beten Leefmilieu  
Broederlijk Delen  
Bulgarian Organic Products Association  
CELL  
Centre of Environmental Activities  
Centrum pre trvaloudržateľné alternatívy (CEPTA)  
Coalition Living Earth  
Collectif Objectif Zéro OGM (OZO)  
Dachverband für Natur- und Umweltschutz  
De Landgenoten  
De Natuur en Milieufederaties  
Deafal ONG  
Det Fælles Bedste  
Druživa, o.z.  
Égalité  
EKOTREND Slovakia – Zväz ekologického poľnohospodárstva  
Fairwatch

Federazione Nazionale Pro Natura  
Fondacija Alica  
Foundation AgriNatura for Agricultural Biodiversity (Fundacja AgriNatura)  
Foundation for Environment and Agriculture  
Foundation for Organic Agriculture  
BIOSELENA  
France Nature Environnement (FNE)  
Friends of the Earth (SPZ)  
Fundación Savia por el Compromiso y los Valores  
Fundacja Strefa Zieleni  
Fundacja Zielone Światło (Green Light Foundation)  
Gen-ethisches Netzwerk e.V.  
Générations Futures  
GM Freeze  
GMWatch  
Grøn Hverdag  
Groupe International d'Études Transdisciplinaires (GIET)  
IG Lebendige Vielfalt  
Iniciativa My sme les  
Instytut Spraw Obywatelskich (the Civil Affairs Institute)  
ISDE, Associazione Medici per l'Ambiente  
LandschappenNL  
Legambiente  
Mediterranean Institute for Nature and Anthropos (MedINA)  
Miljøbevægelsen NOAH  
Natagora  
Natur og Ungdom  
Nature & Progrès Belgique  
Naturvernforbundet (Norwegian Society for the Conservation of Nature)  
obcianska iniciatíva Slovensko bez GMO  
OGM dangers  
Økologisk Norge  
Organic Agriculture Association  
OZ Vidičky parlament na Slovensku  
Pesticide Action Network Netherlands  
Polish Ecological Club  
Rete Semi Rurali ETS  
Save Our Seeds  
Schola Campesina Aps  
Seeds4All  
Slovenský zväz záhradkárov Republikový výbor o. z.  
Slow Food Italia  
Slow Food Luxembourg  
Slow Food Pressburg  
Sociedad Española De Agricultura Ecológica Y Agroecología (SEAE)  
Solidagro  
Spoleczny Instytut Ekologiczny (Social Ecological Institute)  
Terra Nuova  
Terra!  
The Development Fund  
The Norwegian Society of Rural Women

Vidiecka Platforma  
VigilanceOG2M  
Voedsel Anders  
ZMAG  
Zophoros  
Zukunftsstiftung Landwirtschaft

**OTHER**

AgroCert s.r.o.  
Agroecological Network of Greece  
(Agroecology Greece)  
Asociación ECOVALIA  
Bio Garancia Kft  
Biodistretto della Via Amerina e delle Forre  
Coordinamento Zero OGM  
Dachverband Kulturpflanzen – und  
Nutztiervielfalt e.V.  
European Consumers APS  
Fondazione Italiana per la Ricerca in  
Agricoltura Biologica e Biodinamica (FIRAB)  
ÖMKi, Hungarian Research Institute of  
Organic Agriculture  
Pour une Écologie Populaire et Sociale  
(PEPS)  
Réseau Semences Paysannes  
RIES Rete Italiana Economia Solidale  
Robin Food Coalition  
Velt  
Werkgroep Natuurlijk Imkeren (WNI)