

NGT Deregulation: Implications for Beekeeping and Pollinators

As the EU moves towards final adoption of the regulation on New Genomic Techniques (NGTs), it is crucial for Member States to fully assess the collateral impacts on pollinators, beekeeping and food systems.

Key concern on NGT-1 proposed framework

Under the proposed framework, **NGT-1 plants** — which are expected to account for the majority of new genetically modified crops — would be:

- exempt from **risk assessment**,
- exempt from **traceability requirements**,
- exempt from **labelling obligations** (except for seeds),
- not subject to **post-market monitoring**.

This creates a structural blind spot for beekeeping, as bees forage freely across landscapes without boundaries. Consequently:

- if NGT-1 crops are untraceable, **beekeepers cannot know the origin of nectar and pollen collected by bees**;
- **authorities cannot monitor or respond** to unintended environmental effects.

Legal uncertainty for beekeeping products

A critical unresolved issue concerns the legal status of honey and other hive products.

It remains unclear whether products derived from bees foraging on NGT-1 plants could fall under the **Novel Food Regulation**.

A legal opinion by Dr Georg Buchholz (GGSC) highlights a major contradiction:

- NGT-1 plants could be placed on the market **without risk assessment or traceability**,
- while food derived from them — including honey — **may not be marketable if classified as novel food and not authorised**.

This creates a **regulatory paradox**: NGT crops circulate freely and contamination cannot be traced, yet beekeeping products could face **market restrictions or legal disputes**.

Risks for the beekeeping sector

The proposed deregulation may result in:

- **loss of market access** for honey producers due to legal uncertainty, or loss of image as a health product,
- **inability to guarantee GMO-free production,**
- increased **liability risks without traceability tools,**
- undermining of **consumer trust,** especially in countries with strong beekeeping traditions.

For countries like Slovenia and Slovakia, where beekeeping is both an economic and cultural asset, these risks are particularly significant.

Environmental and pollinator risks

Although certain traits (e.g. known insecticidal substances) are excluded from NGT-1, the regulation:

- relies on a **narrow definition (“known”),**
- does not require **systematic risk assessment,**
- does not provide **monitoring mechanisms.**

This means potential impacts on pollinators may go **undetected and unmanaged.**

Consumer demand and transparency concerns

Recent data highlights a strong and consistent demand from European citizens for transparency in food systems:

- More than 85% of EU citizens support mandatory GMO labelling, including for new genomic techniques.
- Over 520,000 citizens have signed petitions calling for the labelling of gene-edited food.
- A coalition of 52 European organisations has launched the campaign *“Blacked-Out Ingredients — Label gene-edited food!”*.

Despite this, the current proposal would:

- remove labelling requirements for the majority of NGT plants (Category 1),
- significantly reduce the level of information available to consumers.

This raises concerns not only about biosafety, but also about consumer rights, market transparency and democratic legitimacy.

For Member States, this implies potential:

- loss of public trust,
- increased market tensions,
- political backlash at the national level.

Conclusion

The current proposal risks creating a system where:

- organisms are deregulated,
- impacts are not monitored,
- and responsibility is shifted onto those who depend on healthy ecosystems.

In this context, **BeeLife calls on Member States** to:

- maintain and strengthen traceability and labelling requirements,
- ensure legal clarity for beekeeping products,
- uphold the precautionary principle,
- avoid regulatory gaps that transfer risks to farmers and beekeepers,
- actively support ongoing parliamentary amendments aimed at ensuring detectability of NGT products and preventing disproportionate patent-related risks.

Relevant recommendations on patent-related amendments are available here:

<https://www.eurovia.org/wp-content/uploads/2026/04/2026-04-Amendments-on-NGT-patents-ECVC-recommandations-final-version-EN.pdf>

**For pollinators and beekeepers, this is not a theoretical issue,
it is a practical, economic and legal risk.**