



## **BeeLife European Beekeeping Coordination**

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### **Object: SCOPAFF meeting Section Genetically Modified Food and Feed on the 13th of June, and the authorisation of GM Sugar beet**

Dear Ms Sacristán Sánchez,

**As the EFSA presented its Assessment of genetically modified sugar beet KWS20-1 for food and feed uses, under Regulation (EC) No 1829/2003 (application GMFF-2023-14732), BeeLife would like to highlight some concerns.**

#### **1. The authorisation application does not take into account all possible uses**

An application has been made for authorisation to place on the market, under Regulation (EC) No 1829/2003, food and feed produced from the genetically modified sugar beet KWS20-1 developed to be tolerant to several herbicide substances (dicamba, glufosinate-ammonium and glyphosate), for the import and use of these products in food and feed.

EFSA's GMO Panel concluded in [its opinion, published on 12 May 2025](#), that KWS20-1 sugar beet is as safe as its conventional counterpart and the non-GM reference sugar beet varieties tested for potential effects on human and animal health, as well as the environment.

However, as this application only concerned products derived from the processing of genetically modified KWS20-1 sugar beet, no environmental assessment was required. It is therefore incorrect to say that, as far as environmental effects are concerned, genetically modified sugar beet is identical to conventional sugar beet.



Sugar beet is a biennial root vegetable that is harvested for the production of sucrose. If the plant is kept in the ground for a second year, a flowering stem grows and produces seeds. The root consists (as a percentage of dry matter) of 65% to 70% sucrose. This is the primary product derived from sugar beets. Most of this sucrose is used for human consumption.

Co-products are mainly used as animal feed:

- molasses, rich in sucrose (43-50%) and protein (7-11%);
- pulps, containing mainly carbohydrates (5 to 10% sucrose, 15 to 21% total fibre) and proteins (7 to 10%).

The aerial parts of beetroot (leaves and tops) can also be used in animal feed (Anses, 2024). As far as animal feed is concerned, beetroot can also be used in the manufacture of syrup to feed honeybees, to supplement their diet during periods of nectar shortage or famine.

No tests were carried out on the natural constituents of the food or feed derived from KWS20-1 sugar beet (Anses, 2024). Only a 90-day repeated-dose oral toxicity study in rats was conducted. The following diets were administered:

- 5% sugar beet pulp from the genetically modified variety KWS20-1 ;
- 2.5% sugar beet pulp from the genetically modified variety KWS20-1 supplemented with 2.5% sugar beet pulp from the isogenic variety;
- 5% sugar beet pulp from the isogenic variety.

**To our knowledge, no thought has been given to the beekeeping sector or the use of beet-based feed syrups for bees. Therefore, no risk assessment was carried out. European beekeepers do not want to see beet-based feed syrups and, more generally, genetically modified plants used in the beekeeping sector. We hope that you will consider these uses for the authorisation decision.**

## **2. Requests for authorisations that continue to run counter to sustainable agriculture**

The genetically modified sugar beet KWS20-1 has been developed to be tolerant to three herbicidal active substances (controversial within the European Union): dicamba, glufosinate-ammonium and glyphosate. The applicant wishes to import products from this crop into Europe.

**As BeeLife, we request that the authorisation of this application not be permitted**, especially if the processed products made from KWS20-1 beets are



intended for use in the feed industry and for human consumption. Not only is the trait of being **“herbicity-tolerant” considered unsustainable and raises the possibility of contamination with herbicide residues in foodstuffs**, but we also do not want products to be knowingly produced with unsustainable practices in Europe. Additionally, as citizens, we would not want these imports to compete with sugar beets produced in Europe, which are not made from herbicide-tolerant crops.

**For both reasons, we in BeeLife would like to request that the Commission and Member States not approve the authorisation in Europe of the genetically modified sugar beet KWS20-1.**

We remain at your disposal for any questions or comments.

Best regards,

Noa Simon Delso  
Scientific Director of BeeLife