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Vilnius

## Opposition to TRIS Notification 2024/0394/HU

Dear Sir/Madam,

I am writing on behalf of GYVI GALI a Lithuanian non-governmental organization dedicated to advocating for sustainable and responsible food practices. We wish to express our strong opposition to the Hungarian draft law to TRIS Notification 2024/0394/HU. GYVI GALI wishes to highlight several critical issues with this draft law, which we believe are not only unnecessary but also detrimental to innovation, consumer choice, and the European single market.

### **1. The EU's Novel Foods Regulation Ensures Safety**

The European Union has already put in place comprehensive legislation to regulate novel foods, including cultivated meat. Regulation (EU) 2015/2283 explicitly applies to foods developed through animal cell culture. This legal framework mandates rigorous safety assessments by the European Food Safety Authority (EFSA), ensuring that any novel food, including cultivated meat, is safe for consumption before it reaches the market. The Hungarian draft law does not acknowledge this well-established and evidence-based process, unnecessarily bypassing the role of EFSA in safeguarding public health.

### **2. The Draft Law May Disrupt the EU Single Market**

One of the core principles of the European Union is the free movement of goods, as stipulated in Regulation (EC) No 178/2002. Banning cultivated meat at the national level, while it may be approved in other Member States, will lead to market fragmentation. This kind of unilateral action risks trade barriers, hampers competition, and could undermine the EU's internal market. Furthermore, this ban would set a concerning precedent, signaling the rejection of innovation that aligns with the EU's goals for sustainability and food security.

### **3. The Ban is Disproportionate and Ignores Established Risk Assessment**

The Hungarian government references the precautionary principle, suggesting that cultivated meat may pose risks to health. However, as outlined by the European Commission, the precautionary principle should only be applied when there is scientific uncertainty about potential harm. Cultivated meat has undergone rigorous safety evaluations in countries such as Singapore and the United States, where no safety concerns have been identified. Additionally, the EU's Novel Foods approval process provides robust risk management, which should be trusted to assess any potential dangers.

#### 4. Limiting Consumer Choice is Unjustified

Public opinion across Europe shows a growing interest in alternative proteins, including cultivated meat, as long as they are deemed safe by authorities. Banning these products without allowing the public to choose for themselves, based on proper risk assessments, undermines consumer freedom. The EU regulatory framework already provides mechanisms for consumer protection and transparency, including mandatory labeling under Regulation (EU) No 1169/2011, which ensures that consumers are fully informed about the origin and nature of the food they purchase.

#### 5. The Draft Law Ignores Opportunities for Economic Synergies

Instead of banning cultivated meat, Hungary could benefit from embracing this emerging sector, which offers new opportunities for rural economies. Cultivated meat production can complement traditional farming by reducing land use and environmental impact, while also allowing farmers to explore new value chains. In fact, the development of this sector could boost local economies by involving farmers in the production of raw materials for cell cultures or collaborating with biotechnological companies.

#### 6. The Law Could Hinder Innovation and Sustainability Goals

The development of cultivated meat is closely aligned with the EU's objectives to combat climate change and promote sustainable food systems. It offers a lower environmental footprint compared to conventional livestock farming, and it could play a key role in reducing greenhouse gas emissions, land degradation, and resource consumption. By banning the production and sale of cultivated meat, Hungary is impeding progress toward the EU's Green Deal and other sustainability initiatives, limiting the country's potential to benefit from a more resilient and environmentally friendly food system.

#### Conclusion

GYVI GALI strongly opposes the Hungarian draft law as it undermines existing EU regulatory frameworks, disrupts the internal market, restricts consumer freedom, and limits innovation in sustainable food production. The EU already has robust safety measures in place, and the ban would serve only to isolate Hungary from beneficial advancements in food technology and economic development. We urge the Hungarian government to reconsider this proposal and instead engage in constructive dialogue on how cultivated meat can complement traditional agricultural practices and contribute to a sustainable future for all.

Thank you for your attention to this matter. We are at your disposal for any further information or clarification you may require.

Yours sincerely,

CEO  
Meda Šermukšnė

