

TRIS-European Commission

September 4th.

Alliance for Biosolutions response to TRIS Notification 2024/0394/HU

Now that we need to readjust our food system, it must be stated that we must use all our "tools." This means we cannot prematurely rule out certain green technologies, such as cultivated meat. European law should protect European companies against anti-competitive regulations like the proposed one.

The purpose of the (EU) 2015/1535 procedure is to prevent obstacles within the internal market, serving as a cornerstone for fair trade among EU member states. Therefore, the Alliance for Biosolutions aligns with the critique of TRIS Notification 2024/0394/HU, since we believe the proposal opposes the (EU) 2015/1535, and therefore wishes to provide the following comments:

- According to (EU) 2015/2283, Section 1: "Differences between national laws concerning the safety assessment and authorisation of novel foods may hinder the free movement of such food, thereby creating legal uncertainty and unfair conditions of competition." In other words, the legislation dictates how variations in national laws create "legal uncertainty and unfair conditions of competition," making 2024/0394/HU appear anti-competitive, contrary to established legislation, and undermining the principle of free movement of goods.
- The 2024/0394/HU states: "It is not clear how the safety of cell-based technology can be guaranteed in order to avoid potential health risks for consumers, and it is therefore necessary to introduce regulation." This claim seems inconsistent, as cultured meat is subject to (EU) 2015/2283 concerning Novel Food, which requires rigorous scientific regulation to ensure its safety and suitability for consumption. Furthermore, the EU enforces strict food regulatory initiatives, overseen by the European Food Safety Authority (EFSA), making the comment in 2024/0394/HU appear unsubstantiated.
- The notification also mentions that "representative population surveys show that consumer opposition to laboratory-grown meat exceeds the rejection of foods containing insect protein" as a reason for why it should be banned. This does not seem to provide a valid argument for the proposed initiative. Instead, it appears as an attempt to remove the consumer's freedom of choice, should cultured meat be approved for sale.
- Finally, much of the proposal seems to approach the issue unscientifically, lacking enough evidence for claims such as cultured meat harming agriculture or a majority preferring insect protein over cultured meat.