



Euroconsumers' Response to the Call for Evidence: Biotech Act II

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Euroconsumers, and its European member organisations in Belgium (Testachats/Testaankoop), Italy (Altroconsumo), Spain (OCU), Portugal (DECOPROteste) and Poland (Euroconsumers Polska), welcome the European Commission's opportunity to provide input on the upcoming Biotech Act II. Together, we represent more than 7 million citizens across Europe. Our mission is to empower people and improve the market.

We are submitting this response because our research shows that European consumers, who are worried about food prices, supply chain fragility, and Europe's global competitiveness, are asking for exactly what a well-designed Biotech Act II could deliver. Our data shows that European consumers believe that **food production is the most important sector for European strategic autonomy**. At the same time, **many consumers struggle to afford protein products**. Our insights show a strong consumer interest in trying alternative proteins, if they were approved and available.

We believe that the Biotech Act II is a real opportunity to create the policy conditions to respond to these core consumer concerns, while also strengthening the European biotech industry.

Food and feed must be in scope

Euroconsumers strongly believes that food biotechnology, including novel proteins, cultivated meat, and precision fermentation, must be substantively addressed in Biotech Act II, not deferred or treated as peripheral to an industrial policy agenda.

This is not a niche concern. Euroconsumers' survey of nearly 10,000 citizens across ten EU Member States found that 85% of respondents consider food production and agriculture to be an area where it is highly important for the **EU to develop independent capabilities** — the highest-ranked sector of all twelve tested, ahead of pharmaceuticals (82%), renewable energy (75%), and semiconductors (61%).¹ European consumers are not waiting for policymakers to connect the dots between biotech investment and food security: they have already drawn that line themselves. Indeed, 46% of consumers across Belgium, Italy, Spain and Portugal actively want the **EU to be more proactive in supporting the production and commercialisation of sustainable meat alternatives**. This demonstrates that there is a democratic mandate for acceleration, not just an industrial one.

The current two-phase structure of the Biotech Act creates a real risk of fragmentation. While the Biotech Act I proposal, adopted in December 2025 under DG SANTE, made

¹ <https://www.euroconsumers.org/wp-content/uploads/2026/03/Euroconsumers-Survey-Consumers-as-geopolitical-actors.pdf>

meaningful progress on food and feed biotechnology, a significant gap remains: **novel foods** were explicitly excluded from the regulatory sandboxes introduced in Biotech Act I, due to supposed ethical or cultural concerns. In light of our research, we believe this exclusion is not justified and should be remedied in Biotech Act II. Europe has an early-mover advantage in this space that is at risk of being surrendered to competitors in the United States and China if regulatory conditions do not keep pace with innovation. The Biotech Act II is the right vehicle to address this, but only if food is explicitly and substantively in scope.

Consumer acceptance: real, growing, and not to be taken for granted

Our 2025 research paper "Is there a place for cultivated meat on consumers' plates?" documents consumer attitudes towards novel proteins across Belgium, Italy, Spain and Portugal.² The headline finding is striking: 50% of respondents across Belgium, Italy, Spain and Portugal said **they would try cultivated meat if it were approved and available in their market**. Even more notably, 43% of those who stated they had no intention to reduce their meat consumption said they would still consider trying cultivated meat. This suggests that the technology can reach consumer segments that plant-based alternatives have not. What our research also shows, however, is that consumer acceptance is conditional rather than automatic, and that the conditions consumers identify have direct policy implications.

The affordability dimension is not abstract. Euroconsumers' 2025 Consumer Affordability Barometer, covering 16,458 households across Belgium, Italy, Portugal and Spain, found that approximately 40% of consumers in Portugal, Italy and Spain already face **difficulty affording meat, fish and vegetarian alternatives** — the single most financially challenging food category in all three countries.³ Novel proteins, if they can achieve competitive pricing at scale, address an existing and documented affordability gap, not a hypothetical one. Yet nearly half of respondents to our survey on alternative proteins (47%) **expect cultivated meat to be cheaper than traditional meat eventually**, while 61% say it will only succeed if affordable for everyone.⁴ This is both a consumer expectation and a policy design requirement: Biotech Act II's investment and scaling measures must be evaluated for their downstream effect on consumer prices, not just on industrial output.

One further consumer insight deserves attention. When respondents were asked who they trusted most to ensure the safety of novel foods, **farmers ranked highest at 27%** — above retailers (11%) and private companies (11%). This suggests that business models linking novel food production to existing agricultural structures — for instance, on-farm bioreactor models for cultivated meat production — may have a consumer trust advantage over

2 <https://www.euroconsumers.org/wp-content/uploads/2025/05/Cultivated-meat-FINAL-2.pdf>

3 <https://www.euroconsumers.org/wp-content/uploads/2026/05/Affordability-Barometer.pdf>

4 <https://www.euroconsumers.org/wp-content/uploads/2025/05/Cultivated-meat-FINAL-2.pdf>

purely industrial approaches.⁵ Biotech Act II should consider how its support for biomanufacturing infrastructure can be structured to draw on this trust asset, including through rural and agricultural value chains.

Awareness is low, but willingness is there once people are informed. In the case of precision fermentation, 73% of consumers surveyed across our membership countries had never heard of the process. A further 23% had heard of it but were not well-informed. Yet over 50% said they would be willing to try precision fermentation-derived products once informed, with nutritional composition, price and taste as their main considerations.⁶ This is a significant latent demand signal. Market uptake will not follow automatically from regulatory change alone — consumer information and engagement measures are a necessary complement to supply-side instruments, and the Act should reflect this.

Safety governance underpins everything. Consumers will not adopt novel biotech food products **without robust, transparent safety assessment and clear EU-level authorisation**. This makes the case for faster and more efficient processes, not weaker ones. The goal should be rigorous safety standards delivered through a process that is predictable, proportionate, and accessible to the innovative SMEs most likely to bring affordable novel food products to European consumers. 68% of consumers trust EFSA to judge whether cultivated meat is safe for consumption.⁷ That trust is the foundation on which market uptake will be built. It must not be squandered by processes that are so slow or costly that they filter out the innovative SMEs most likely to bring affordable products to market.

Strategic resilience is a consumer issue

The Act's objective of **reducing EU dependence on fossil feedstocks and imported inputs** is directly aligned with documented consumer expectations. Euroconsumers' March 2026 survey "Consumers as Geopolitical Actors," conducted with nearly 10,000 respondents across ten EU Member States, found that 80% want the EU to invest in its own technology to reduce strategic dependencies, and that **food production ranked as the single most important sector for European strategic autonomy** — above defence, energy, and digital technology.⁸ This is a consumer mandate for exactly the kind of de-fossilisation and domestic production investment the Act is designed to deliver.

From a consumer perspective, the resilience argument extends directly to food. Novel proteins produced via fermentation and cultivated meat technologies offer the potential to reduce European dependence on imported protein sources and fossil-intensive agricultural inputs. This is not only an environmental or industrial policy argument, but a

5 <https://www.euroconsumers.org/wp-content/uploads/2025/05/Cultivated-meat-FINAL-2.pdf>

6 <https://www.euroconsumers.org/wp-content/uploads/2025/05/Cultivated-meat-FINAL-2.pdf>



7 <https://www.euroconsumers.org/wp-content/uploads/2025/05/Cultivated-meat-FINAL-2.pdf>

8 <https://www.euroconsumers.org/wp-content/uploads/2026/03/Euroconsumers-Survey-Consumers-as-geopolitical-actors.pdf>

food security and affordability argument. The EU's heavy dependence on imported protein for livestock feed — **a structural vulnerability exposed by both the COVID-19 pandemic and the war in Ukraine** — means that domestic novel protein production is not simply a market opportunity but a food security investment. A diet change scenario including cultivated meat and precision fermentation-derived proteins could cut Europe's overseas land use significantly and meaningfully reduce exposure to supply chain disruption. From a consumer welfare perspective, this resilience dividend is as important as the environmental one. The Commission should ensure the Act **reflects this consumer welfare dimension of strategic autonomy**, and not limit its resilience framing to industrial feedstocks alone.

Conclusion

The Biotech Act II represents a significant opportunity to **put European consumers at the centre of the bio-based transition**, rather than treating consumer acceptance as a variable to be managed after the policy is designed. Euroconsumers urges the Commission to:

-  **Explicitly include food biotechnology, including novel proteins, cultivated meat and precision fermentation, in the scope of Biotech Act II's industrial instruments, including sandbox provisions, lead market measures and investment support.** Consumer surveys across our member countries show a majority willingness to adopt these products under the right conditions, and 85% of European citizens rank food production as the EU's highest-priority sector for strategic autonomy. These technologies cannot be treated as residual to an industrial policy agenda.
-  **Design lead market and supply-side scaling measures with consumer price outcomes as an explicit design criterion.** The Affordability Barometer shows that around 40% of households in southern Europe already struggle to afford protein products, while half of all consumers say they would reduce meat consumption if alternatives were not prohibitively expensive. Investment in shared biomanufacturing infrastructure, reduced authorisation costs for SMEs, and open-source public R&D conditionality are direct levers for consumer affordability.
-  **Revisit the exclusion of novel foods from regulatory sandbox provisions.** The reasoning applied in Biotech Act I — that ethical or cultural considerations precluded sandboxing for novel foods — does not withstand scrutiny in light of consumer evidence. Majorities of European consumers are open to novel biotech food products subject to EFSA approval. Excluding these products from sandboxes does not protect consumers; it delays the access to safe, affordable, sustainable food that consumers are asking for.

- **Invest in consumer information and engagement** as a genuine complement to regulatory and market measures, given documented low awareness of novel biotechnologies.
- **Ensure that labelling and transparency requirements for novel bio-based food products are designed to build consumer confidence and trust**, not to stigmatise products that have passed rigorous safety assessment.
- **Focus regulatory simplification on process efficiency and proportionality** while maintaining the safety and transparency standards that underpin public trust in the food system.

Euroconsumers stands ready to contribute further evidence and to engage with the European Commission throughout the development of the proposal.



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improve the market.

