

The Consumer Voice in Europe

Ref.: BEUC- X-2019-023/MGO/CPE/cm

15 April 2019

Re: Please seize this last opportunity to delete so-called 'innovation principle' from Horizon Europe

Dear Member of the European Parliament,

At this week's plenary session, on 17 April, you will be voting on the partial agreement reached with the Council on the future EU research funding programme, 'Horizon Europe'¹.

The European Consumer Organisation (BEUC) **calls on you to seize this last opportunity to delete the so-called 'innovation principle'** from Horizon Europe by **supporting**:

- **AM 212** to the Nica Report
- **AM 300** to the Ehler Report

Innovation holds many promises for consumer welfare provided it is well designed and centred on the real needs and expectations of people and society. But innovation is neither an end in itself, nor is it always beneficial.

For that reason, BEUC wishes to reiterate our position that the so-called '**innovation principle**' **has no place in the EU research funding programme, nor in any other EU legal text**. Not only does it have no legal basis or any democratic legitimacy, but it is not even needed, as a significant part of EU policies and regulations is already geared towards promoting innovation.

It already is normal practice for the European Commission, when conducting an impact assessment of future legislation, to consider a broad range of potential impacts, including on innovation but also on consumers, the environment, etc. **As we see it, the 'innovation principle' thus essentially aims to counter-balance the Treaty-based precautionary principle.**

The precautionary principle is a **safety net for European consumers**. It crucially allows authorities to take temporary, precautionary measures in the absence of a final proof of harm to consumers or the environment. As such it is different from the *prevention* principle², which aims to prevent damages to the environment, of which the effects are known and undisputed, from occurring at all.

.../...

¹ Horizon Europe consists in a package of two proposals, a [regulation](#) and a [decision](#).

² <https://www.eea.europa.eu/help/glossary/eea-glossary/prevention-principle>

Contrary to widespread misconceptions, **science is central to the proper use of the precautionary principle**. Faced with indications of possible harmful effects on the environment or health, albeit with insufficient, inconclusive, or uncertain evidence, policy-makers can decide to invoke (or not) the precautionary principle to reflect the level of protection desired by society³. The precautionary principle is meant to guide the political choices which are made to manage the risks identified by scientific research.

Another widespread misconception about the precautionary principle is that it stifles innovation. On the contrary, **the precautionary principle pushes industry to research and innovate in safer or greener alternatives**, which benefits both consumers and the economy⁴.

In fact, **the precautionary principle is underused**. It took years, sometimes decades, for policymakers to address some health hazards, despite early warnings. One notorious example is lead that was added to petrol for decades, ignoring experts' warning about its likely toxicity as early as 1925. The European Environment Agency's report '*Late lessons from early warnings: science, precaution, innovation*'⁵ includes numerous instances of cases where early warnings existed but no actions were taken⁶.

Legitimate and effective regulation based on the precautionary principle has been, and will remain in the future, critical for ensuring consumer trust in innovation. It promotes worthwhile innovation that is valuable to society at large and ensures that proper weight is given to environmental and health risks and concerns.

We thank you in advance for taking the above into consideration when voting on Horizon Europe.

Yours faithfully,

Monique Goyens
Director General

Camille Perrin
Senior Food Policy Officer

³ See EC [Communication](#) on the precautionary principle (2001).

⁴ A 2013 [report](#) by CIEL showed that "*spikes in the patenting of phthalate-alternatives clearly correlate with the timing of new laws to protect people and wildlife from phthalates. As the stringency of measures increased, so too did the number of inventions disclosed in patent filings by the chemical industry. Similarly, the phase-out of ozone depleting substances also illustrates how progressively stricter rules at the global level can drive a sustained effort to invent safer alternatives.*" <https://www.eea.europa.eu/publications/late-lessons-2>

⁶ Despite claims to the contrary, the Precautionary Principle has never been used under the REACH regulation to regulate a chemical according to the Commission [recent review](#).