To:
The Council of the European Union,
Ministers for Agriculture

Cc:
Commissioner Stella Kyriakides
Commissioner Franz Timmermans
Commissioner Janusz Wojciechowski

Brussels, 21 May 2021

Re: Presentation of the EC study on new genomic techniques to the AgriFish Council on 26/27 May

Dear Madam, Sir,

The undersigned value chain partners welcome that the Commission Study on New Genomic Techniques[1] (NGT Study) published on 29 April recognises the potential benefits of NGTs in plants, animals, and microorganisms, in a broad variety of applications. We support the conclusions of the study that the current GMO legislation in the EU has clear implementation challenges and is no longer fit for purpose. We strongly welcome the Commissions' intention to initiate in the short term a policy action on plants derived from targeted mutagenesis and cisgenesis. We hope that such a policy initiative will create a more enabling and innovation-friendly environment for products resulting from these breeding methods, while keeping the high standards of EU food and feed production. We count on your support for immediate policy action based on the conclusions of the NGT Study.

We welcome the Commission's conclusion that a differentiated regulatory approach is needed, which looks at both the process and the product. This needs to take the benefits of these new genomic techniques and the resulting products into account, as is the case in a growing number of countries around the world.

Also, we regard it important to address this topic from a global perspective, taking into account the trade related challenges. This is clearly mentioned in the study in relation to the policy developments around the world and their implications for competitiveness of the EU Agri-Food value chain as well as the enforceability of the ECJ ruling.

As the NGT study rightly acknowledges, already today (as a result of the ECJ judgement in case C-528/16 on mutagenesis breeding), the potential of new genomic techniques remains untapped in Europe. With this, European agriculture and some other of the EU's most innovative sectors are disconnected from scientific progress, putting them at a competitive disadvantage compared to their counterparts in a rapidly growing group of countries with more enabling regulations. Consequently, Europe's leading position in innovative breeding is at stake, as are jobs in agriculture, bioindustries and their associated value chains, international trade flows and sustainability. This does not only concern plant production but is also valid for the livestock sector and the fermentation industry.

While we strongly welcome the prospect of further policy action in the area of plants, we also would like to encourage the Commission to timely initiate discussions with the relevant

[1] https://ec.europa.eu/food/plant/gmo/modern_biotech/new-genomic-techniques_en

stakeholders on the review of the regulatory approach in other sectors. These techniques hold great potential for the animal breeding sector and for the development of new/further development and improvement of existing strains of microorganisms to support the transition to more sustainable food systems. The undersigned agri-food value chain partners are committed to engage in the ongoing dialogue also to address potential concerns and to contribute to further scientific knowledge in order to advance the current discussion for future policy actions on this important topic.

European Agriculture and its associated value chains must meet an increasing demand for high-quality food, feed and bio-based goods while using limited resources and producing fewer emissions. However, this sector already suffers from climate change and more extreme weather conditions. The challenging goals of the European Green Deal and of one of its key components, the Farm to Fork Strategy, can only be achieved if the food chain is part of the solution to adapt to and to mitigate climate change. We agree that in this context the EU "needs to develop innovative ways to protect harvests and animals from pests and diseases and to consider the potential role of new innovative techniques to improve the sustainability of the food system"[2]. This is also confirmed by a recent study from HFFA Research on the "The socio-economic and environmental values of plant breeding in the EU"[3] which underscores the need for further breeding innovation to mitigate unintended negative effects on EU agricultural productivity resulting from the full implementation of the EU Farm to Fork and Biodiversity strategies objectives.

Farmers and consumers must form a central part of the "Farm to Fork Strategy" under the European Green Deal and we believe that farmers in particular need to have the right toolbox available to support a sustainable food supply chain. In its communication on the Green Deal, the European Commission underlines that new technologies, sustainable solutions and disruptive innovation are critical to achieve its the objectives. The undersigned agri-food value chain partners are committed to contribute to society and consumer expectations in view of healthy diets, biodiversity and a sustainable agricultural model. The NGT study now confirms that "several of the plant products obtained from NGTs" can contribute to various goals of the European Green Deal by saving land resources, allowing a more sustainable use of crop protection products, antibiotics and emissions while stabilizing and increasing crop yields and improving animal health and welfare to ensure food security.

Given that discussions on the status of new genomic techniques have been going on for more than 10 years and have now been summarized with the outcome of the NGT Study, we call on you to ensure that the findings of the study are also reflected in your Council conclusions.

Yours faithfully,

Céline Duroc, Director General of MAIZ'EUROP' for the Platform Agriculture and Progress

AGRICULTURE & PROGRESS

[2] https://ec.europa.eu/info/sites/info/files/european-green-deal-communication_en.pdf

[3] https://hffa-research.com/wp-content/uploads/2021/05/HFFA-Research-The-socio-economic-and-environmental-values-of-plant-breeding-in-the-EU.pdf

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