

Brussels, 10 November 2025

Open letter

Subject: Support for a science-based and innovation-friendly framework for New Genomic Techniques (NGTs) plants

Honorable Members of the European Parliament,

Copa and Cogeca (www.copa-cogeca.eu) are the united voice of farmers and agri-cooperatives in the EU, Euroseeds (www.euroseeds.eu) is the single voice of the European plant breeding and the seed sector. Together we represent most breeders, seed suppliers, and users of seeds in the European Union.

Ahead of the upcoming trilogue negotiations on New Genomic Techniques (NGTs), we reiterate our support for a science-based, innovation-friendly approach, which ensures NGT category 1 plants are in the same manner as conventional plants, in line with the European Commission's proposal. In this regard, we would like to reiterate the following principles:

Sustainability considerations

A sustainability assessment linked to verification of NGT 1 status is outside the mandate of co-legislators, both in Parliament and in the Council.

The verification procedure to establish the category status is a technical and scientific assessment designed solely to determine whether a plant meets certain molecular and genetic criteria. Its purpose is to ensure compliance with clear scientific definitions, not to evaluate agronomic performance, environmental impact, or sustainability outcomes.

The EU already has comprehensive and robust legislation in place, such as the Novel food and Novel feed Regulations, Plant Health Regulation, Plant Reproductive Material (PRM) legislation, environmental protection laws, and food and feed safety regulations that effectively prevent the placing on the market of plants with unintended or harmful effects.

Introducing sustainability criteria in the verification procedure would mix distinct regulatory objectives and undermine the scientific integrity, predictability, and legal clarity of the classification process, as defined in Annex I.

Moreover, several third countries already have legislation in place enabling these techniques. In any of them, sustainability is part of the authorization/marketing procedure. Therefore, introducing it for Europe will only introduce a huge divergence between the EU regulatory framework and all the other regulatory frameworks established so far in other parts of the world.

Such divergence risks put the EU at a competitive disadvantage, hindering international trade and cooperation and joint research between EU and non-EU institutions and weakening Europe's leadership in agricultural innovation.

Traceability and labelling

In line with the [joint position of 28 agri-food stakeholders](#), we reject any further mandatory traceability and labelling requirements for conventional-like NGT products.

Transparency is best achieved through the existing official national variety lists and the European catalogue, which together form a unique and reliable system consolidating all essential information on plant varieties—without creating additional reporting burdens.

Moreover, information will also be available through company catalogues and eventually, it could also be included on seed bag labels, which constitutes the highest practicable level of labelling. This approach provides transparency and allows users to make informed choices, without introducing unnecessary burdens or confusing distinctions at the consumer level, fully consistent with the principle that NGT 1 plants should not be regulated differently from conventionally bred plants.

It is also important to note that much of the organic sector has expressed the wish to exclude the use of NGT 1 plants, choosing instead to focus solely on conventionally bred varieties. This choice must be respected but it must not result in additional legal obligations or traceability requirements as regards NGT 1 plants. Voluntary labelling indicating that products are free from NGT-derived material may be introduced, should operators within the supply chain choose to apply such measures.

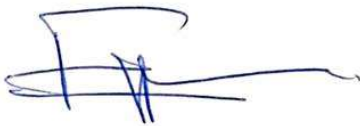
For these reasons, we urge you in the European Parliament to move faster and support a science-based, proportionate and enabling NGT regulatory framework, consistent with international partners and that keeps regulatory burden to its minimum.

This approach will safeguard the integrity of EU legislation and strengthen Europe's ability to respond effectively to global challenges in food security, climate adaptation, and sustainability in agriculture.

Thank you for your attention and your continued commitment to evidence-based policymaking.

Kind regards,

Elli Tsiforou, Secretary General



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european farmers european agri-cooperatives

Garlich von Essen, Secretary General



 **Euroseeds**
Embracing Nature