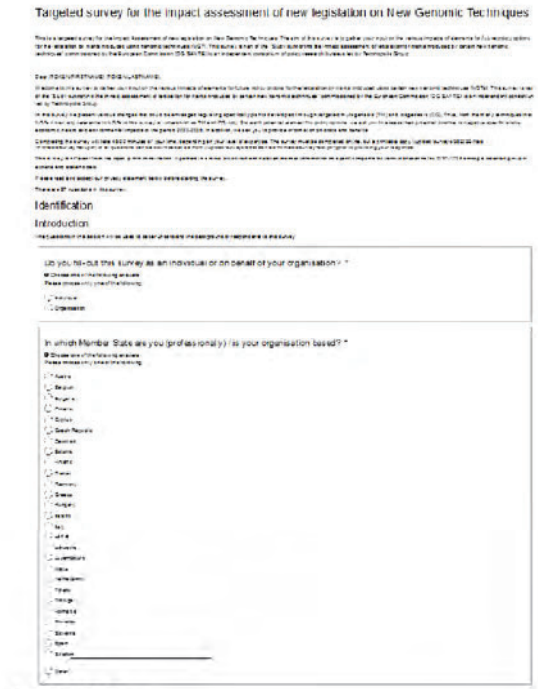


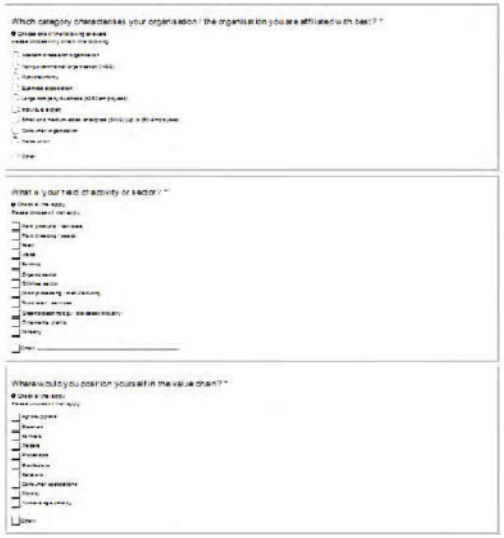
Targeted survey for the impact assessment of new legislation on New Genomic Techniques

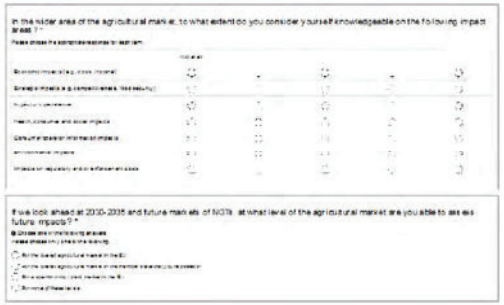
Identification

Introduction

Do you fill-out this survey as an individual or on behalf of your organisation? *

In which Member State are you (professionally) / is your organisation based? *

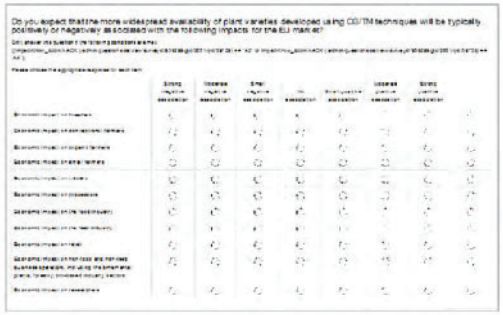




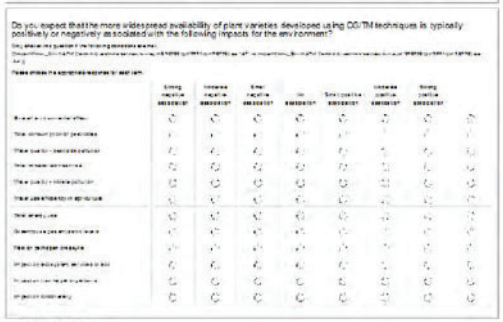
General assessments

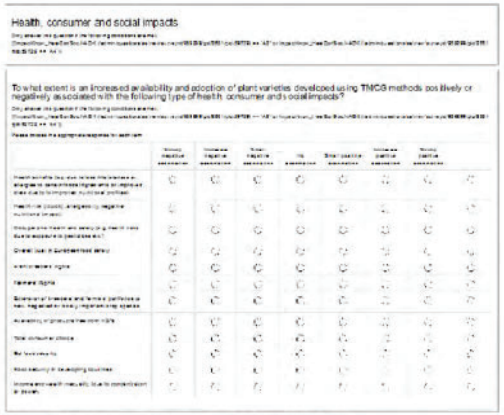
Introduction


In the current situation, what are the most important factors for plant breeders in deciding to develop new plant varieties using CG/TM techniques for the EU market? Please distribute 100 points over the following seven categories:
Please specify here what other factors play a role in deciding whether to develop new plant varieties using CG/TM techniques for the EU market?
Economic impacts



Environmental impacts





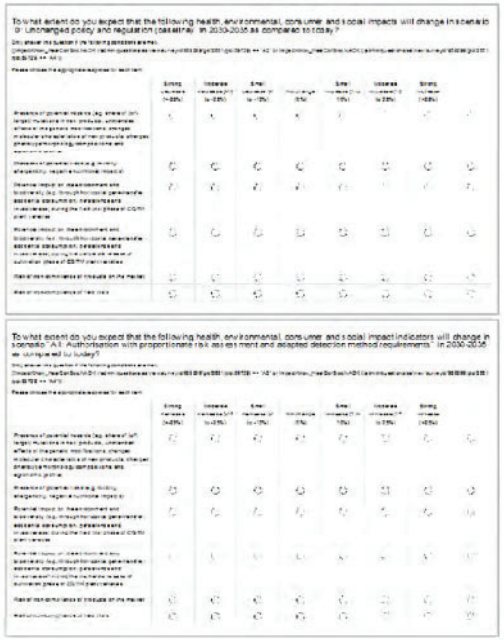
Scenarios for 2030-2035 related to risk assessmen: and detection method

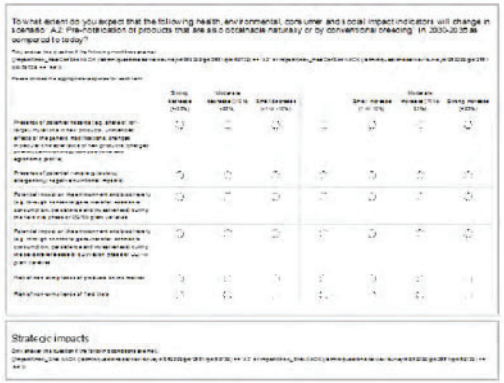
Introduction

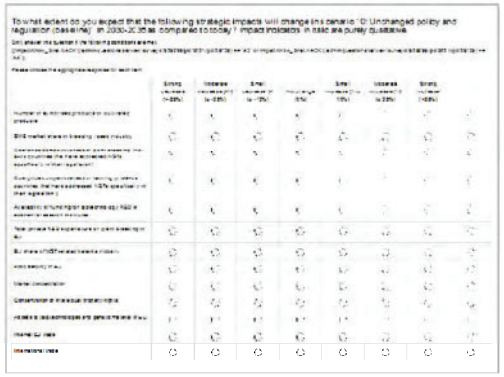
Risk-related impacts

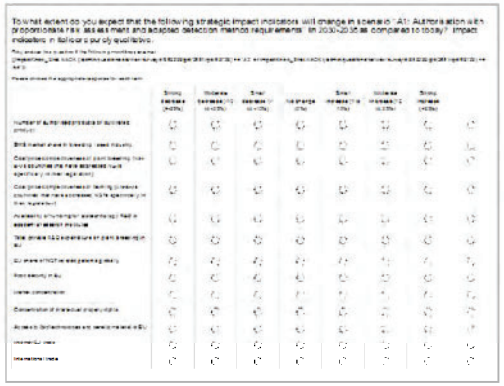
At the end of {if(MarketLevel=='OMS';'MemberStates known';'the EU')}, how many CGTMproduced plant varieties do you expect to be on the market for each of the scenarios in 2030-2035? Please consider the {if(MarketLevel=='SBU';'[CropCategory shown] market only';'the overall agricultural market')}.

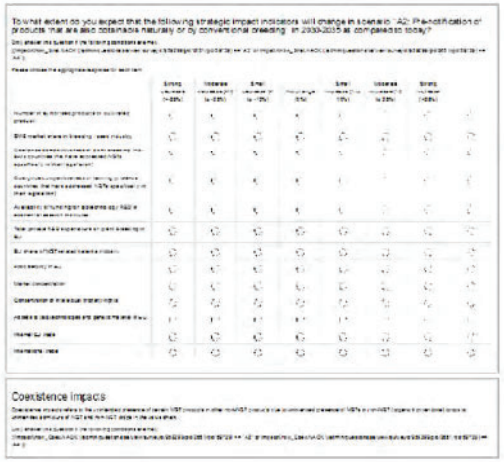
At the end of {if(MarketLevel=='OMS';'MemberStates known';'the EU')} and for each of the scenarios, what percentage of all plant varieties on the market in 2030-2035 do you expect to be developed using CGTMtechniques? Please consider the {if(MarketLevel=='SBU';'[CropCategory shown] market only';'the overall agricultural market')}.



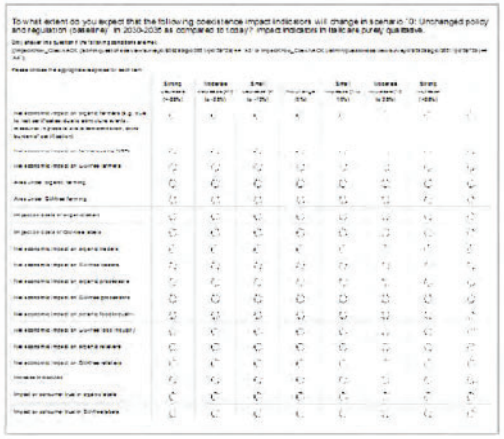








Coexistence impacts

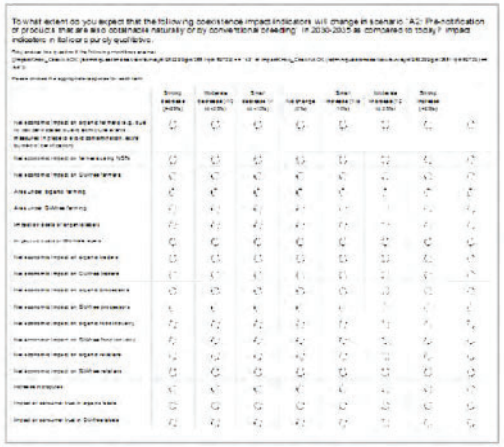


To what extent do you expect that the following coexistence impact indicators will change in scenario "A1: Authorisation with proportionate risk assessment and adapted detection method requirements" in 2030-2035 as compared to today? Impact indicators in italic are purely qualitative.

[illegible]

[illegible]

	Strong decrease [illegible]	Moderate decrease [illegible]	Small decrease [illegible]	No change [illegible]	Small increase [illegible]	Moderate increase [illegible]	Strong increase [illegible]	
Net economic impact on organic farmers (e.g. due [illegible] measures in place to avoid contamination [illegible])								
Net economic impact on farmers using NGTs								
Net economic impact on [illegible] farmers								
Area under organic farming								
Area under [illegible] farming								
[illegible]								
[illegible]								
Net economic impact on organic traders								
Net economic impact on [illegible] traders								
Net economic impact on organic processors								
Net economic impact on [illegible] processors								
Net economic impact on organic food industry								
Net economic impact on [illegible] food industry								
Net economic impact on organic retailers								
Net economic impact on [illegible] retailers								
[illegible]								
Impact on consumer trust in organic labels								
Impact on consumer trust in [illegible] labels								



Scenarios for 2030-2035 Risk Assessment Factors for plant breeders using CC/TM

Please rate to what extent these scenarios affect the attractiveness of plant breeding using CG/TM techniques in the EU for EU/international cultivation, compared to the situation today

[illegible]

	[illegible]	[illegible]	[illegible]
[illegible]			
[illegible]			
[illegible]			
[illegible]			

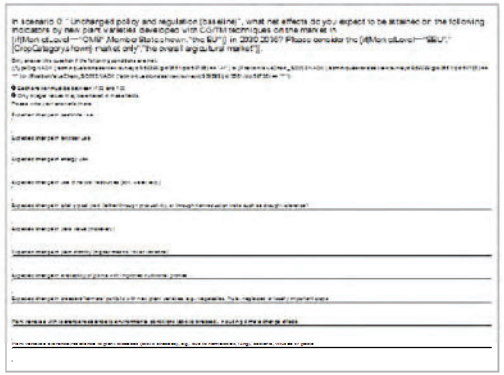
Scenarios for 2030-2035 - Risk Assessment - Impact of traits

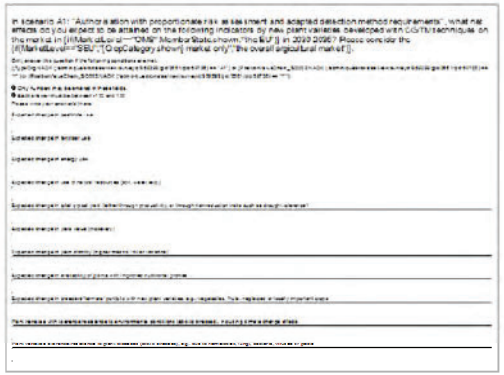
[illegible]

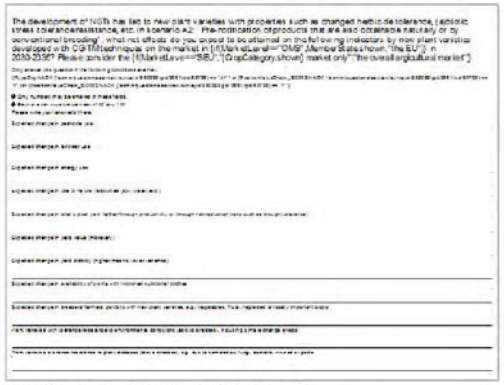
[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]

Impact of traits from CG/TM-based plant varieties

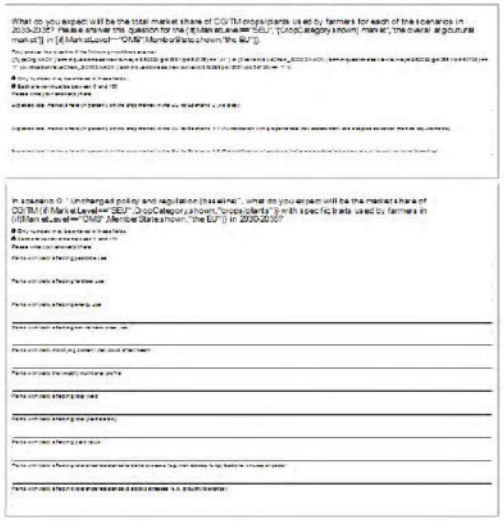
[illegible]

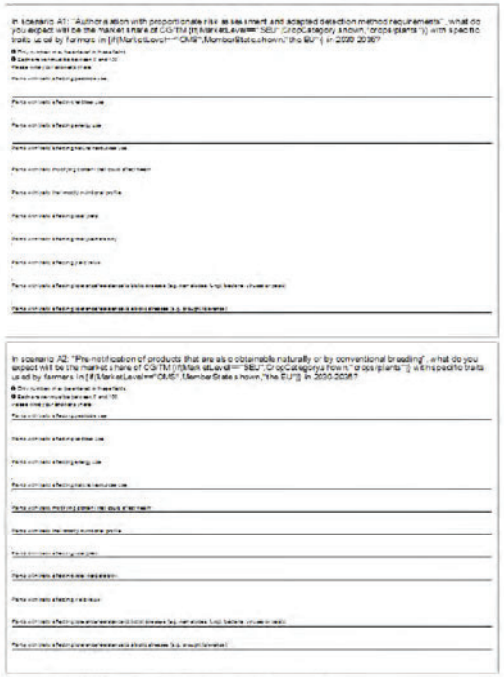




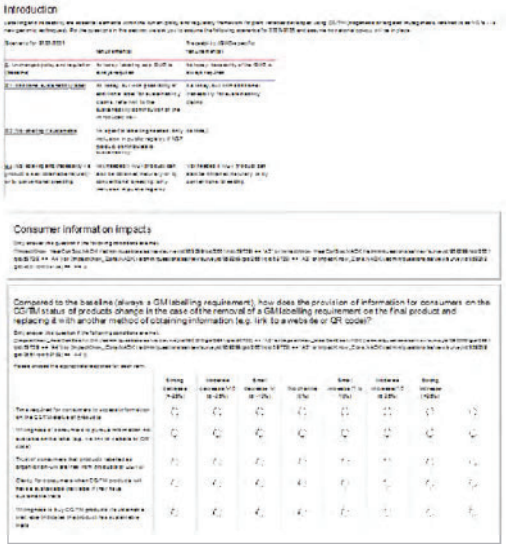


Scenarios for 2030-2035 - Risk Assessment - Adoption by farmers



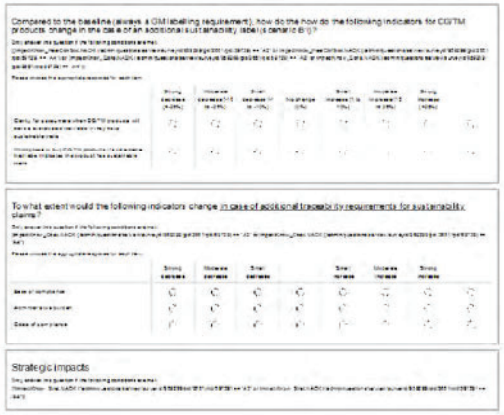


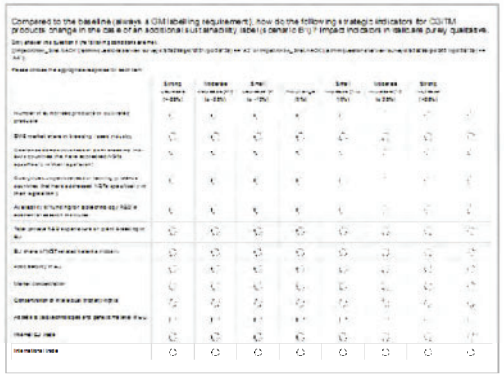
Scenarios for 2030-2035 related to labelling and traceability requirements

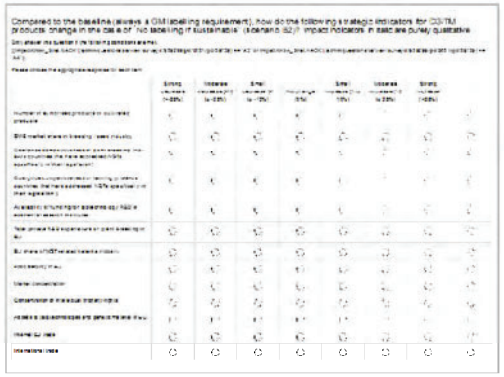

Introduction

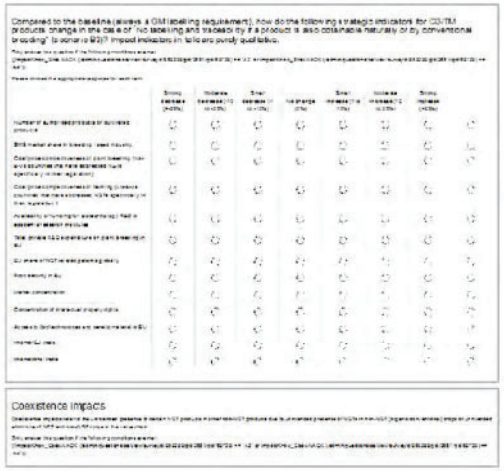
Consumer information impacts

Compared to the baseline (always a GM labelling requirement), how does the provision of information for consumers on the GE/Not status of products change in the case of the removal of a GM labelling requirement on the final product and replacing it with another method of obtaining information (e.g. link to a website or QR code)?

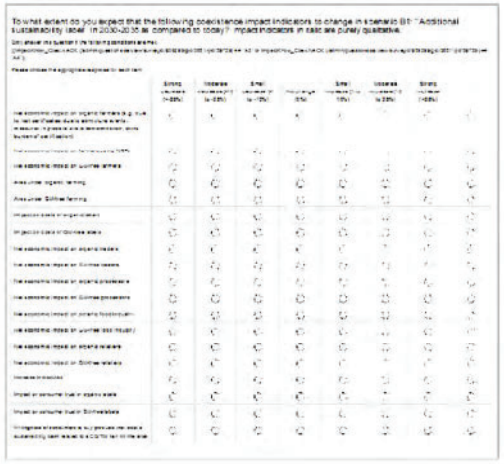

Compared to the baseline (above a GM labelling requirement), how do the how do the following indicators for CGTM products change in the case of an additional sustainability label (a certain EU)?
To what extent would the following indicators change in case of additional traceability requirements for sustainability claims?
Strategic impacts

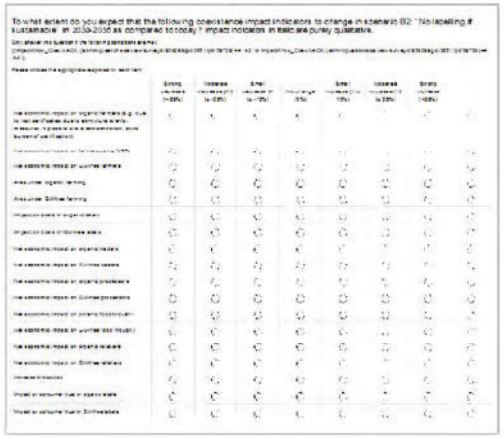


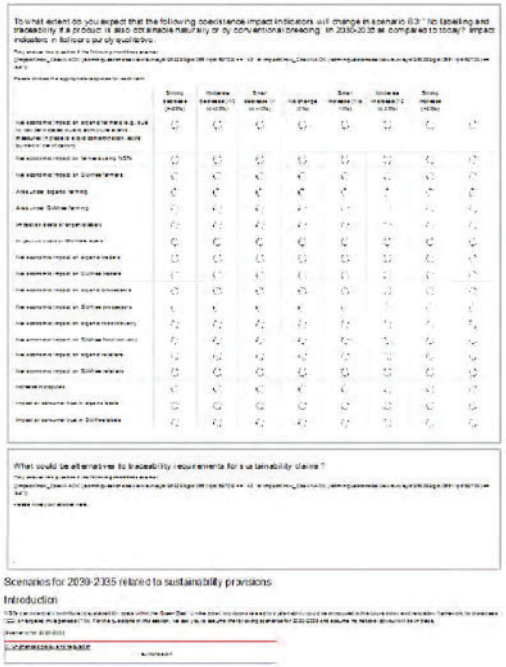




Coexistence impacts







To what extent do you expect that the following coexistence impact indicators will change in scenario 63 ? (a) labelling and traceability if a product is also obtainable naturally or by conventional breeding. (in 2030-2035 as compared to today? Impact indicators in italics are purely qualitative.

Please indicate the appropriate response for each item:

	Strong decrease (>20%)	Moderate decrease (5-20%)	Small decrease (1-5%)	No change (0%)	Small increase (1-5%)	Moderate increase (5-20%)	Strong increase (>20%)	
The economic impact on organic farms (e.g. due to certification costs and income and marketing effects) and distribution, and business competitiveness)								
The economic impact on farmers (only 10%)								
The economic impact on Conventional								
Area under organic farming								
Area under GMOs farming								
Intensity level of exploitation								
Pollution caused by the food supply								
The economic impact on organic traders								
The economic impact on Conventional traders								
The economic impact on organic processors								
The economic impact on GMOs processors								
The economic impact on organic retailers(only)								
The economic impact on GMOs food retailers								
The economic impact on organic retailers								
The economic impact on GMOs retailers								
Increase in prices								
Impact on consumer trust in organic labels								
Impact on consumer trust in GMOs labels								

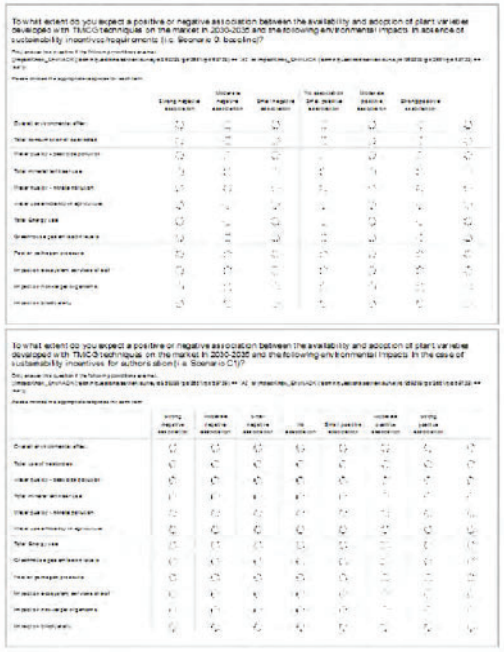
What would be alternatives to traceability requirements for sustainability claims ?

Please indicate your answer here:

Scenarios for 2030-2035 related to sustainability provisions

Introduction


Environmental impacts



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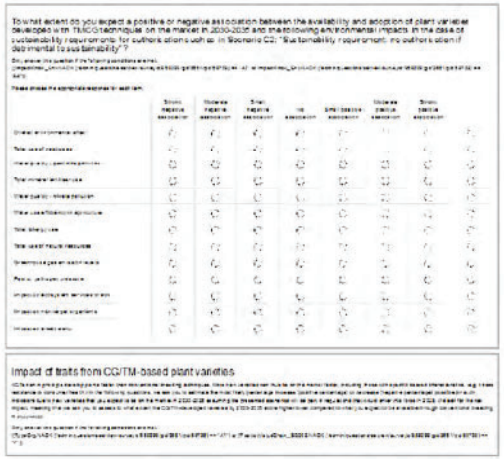
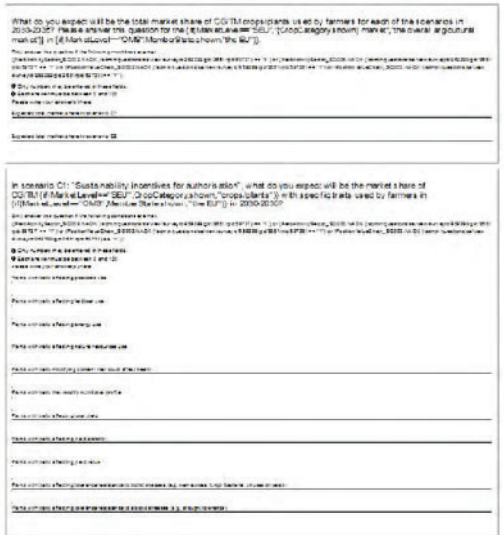
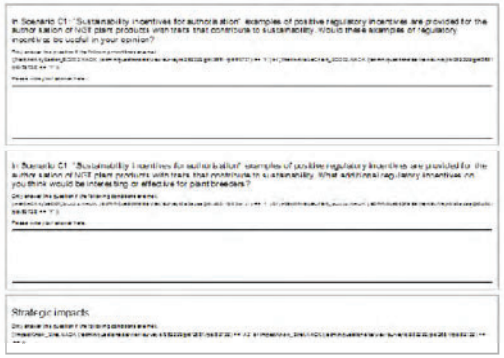


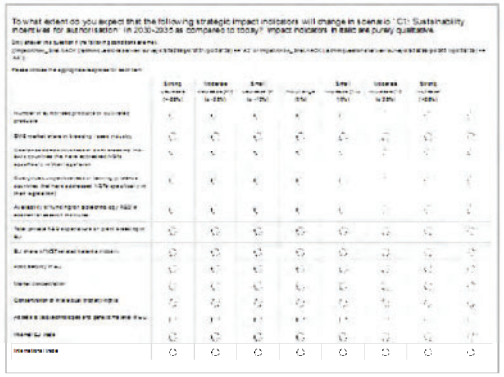
Impact of traits from CC/TM-based plant varieties


Adoption by farmers of plants developed with CGTM techniques



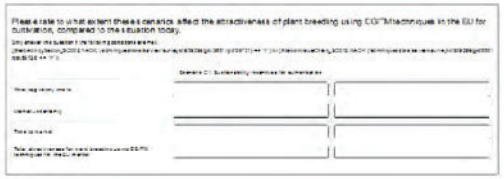
Factors for plant breeders developing varieties using CGTM





To what extent do you expect that the following strategic impact indicators will change in scenario " C2: Sustainability requirement: no authorisation if detrimental to sustainability " in 2030-2035 as compared to today? Impact indicators in teal are purely qualitative.

Scenarios for 2030-2035 - Sustainability - Factors Plant Breeders



Questions on costs


What is the estimated cost for a GM authorisation for cultivation under scenario 1 Unchanged policy and regulation (baseline) in 2030-2035?
Please note that the main legal rules in this scenario are:
• Regulation 1829/2003
• Regulation 503/2013
Please note that the costs to account for in estimates are:
• Reporting for hazard identification
• Exposure assessment
• Post market monitoring
• Environmental assessment
• Environmental monitoring plan
• Information relating to the safety of genetically modified food and feed
• Traceability and labelling
Activities triggering authorisation costs are:
• Notification of specific activities or events
• Submission of (recurring) reports , including on post market monitoring
• Information labelling for third parties
• Non-labelling information for third parties
• Application for individual authorisation or exemption
• Application for general authorisation or exemption
• Registration
• Certification of products or processes
• Inspection on behalf of public authorities
• Cooperation with audits and inspection by public authorities, including maintenance of approved lab
• Any obligation on citizens
The answers are in million EUR.

Would you have any auxiliary clarifications on the cost estimates related to submission for cultivation? Please indicate below.

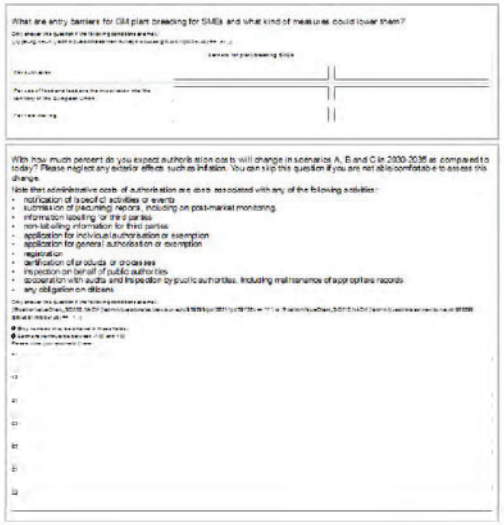

What is the estimated cost (in million EUR) for a GM submission submission for field trialling under scenario 0 (Unchanged policy and regulation (baseline)), in 2030-2035?
Please note that the main legal rules in this scenario are:
• Directive 2001/18/EC (article 6)
Please note that the costs to account for in estimates are:
• General information
• Information relating to the recipient or parental plants
• Information relating to the genetic modification
• Information relating to the genetically modified plant
• Information relating to the risks of release
• Information relating to the release
• Information on control, monitoring, post release and waste treatment plans
• Monitoring plan
• Summary
Activities triggering authorisation costs are:
• Notification of (a)specific advice(s) or event(s)
• Submission of request(s) reports, including on post-market monitoring
• Information labeling for third parties
• Non-labelling information for third parties
• Application for individual authorisation or exemption
• Application for general authorisation or exemption
• Registration
• Certification of products or processes
• Inspection on behalf of public authorities
• Cooperation with audits and inspection by public authorities, including maintenance of appropriate records
• Any obligation on citizens
The answers are in million EUR.
Would you have any auxiliary clarifications on the cost estimates related to submission for field trialling? Please indicate below.


What is the estimated cost (in million EUR) for a GM authorisation submission for use as food or feed and the importation into the territory of the EU under a scenario 0 - Unchanged policy and regulation (baseline) - in 2030-2035?
Please note that the main legal rules in this scenario are:
Regulation 1829/2003
Regulation 503/2013
Please note that the costs to account for in estimates are:
Hazard identification and characterisation
Exposure assessment
Post-market monitoring
Environmental assessment
Environmental monitoring plan
Information relating to the safety of genetically modified food and feed
Traceability and labelling
Activities triggering authorisation costs are:
Notification of specific activities or events
Submission of (recurring) reports, including on post-market monitoring
Information labelling for third parties
Non-labelling information for third parties
Application for individual authorisation or exemption
Application for general authorisation or exemption
Registration
Certification of products or processes
Inspection on behalf of public authorities
Cooperation with audits and inspection by public authorities, including maintenance of approved lab
Any obligation on citizens
The answers are in million EUR.


Would you have any auxiliary clarifications on the cost estimates related to submission for use for food and feed? Please indicate below.


How are authorisation costs split over the following type of costs? Please provide a percentage if possible.

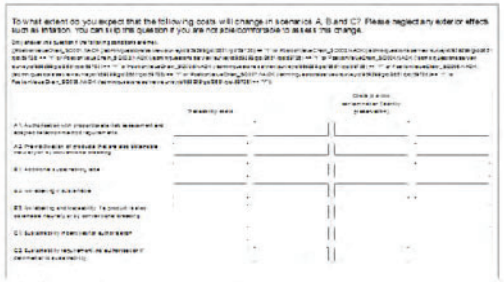

Please comment on the split of the authorisation costs that you provided in the previous question and specify 'Other' when it was ticked
What is the average duration (in years) for a GM crop authorisation (from application to authorisation)?
What share (in percentages) of your annual turnover do GM authorisation costs represent?
How significant is the cost of delay for your business as a result of the length of the authorisation procedure?


What are entry barriers for GM plant breeding for SMEs and what kind of measures could lower them?
With how much percent do you expect authorisation costs will change in scenarios A, B and C in 2030-2035 as compared to today? Please neglect any exterior effects such as inflation. You can skip this question if you are not able/comfortable to assess this change.
Note that administrative costs of authorisation are costs associated with any of the following activities:
notification of (specific) activities or events
submission of (recurring) reports, including on post-market monitoring
information labelling for third parties
non-labelling information for third parties
application for individual authorisation or exemption
application for general authorisation or exemption
registration
certification of products or processes
inspection on behalf of public authorities
cooperation with audits and inspection by public authorities, including maintenance of appropriate records
any obligation on citizens

Please describe any other expected direct or indirect costs for individual scenarios in 2030-2035

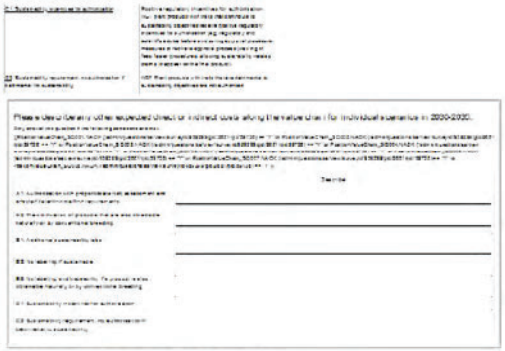
Describe

Questions on costs - Costs along the value chain

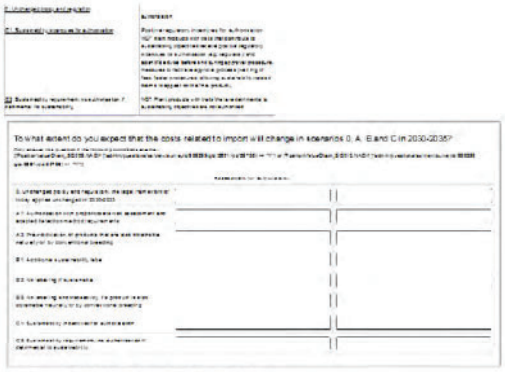


To what extent do you expect that the following costs will change in scenarios A, B and C? Please neglect any exterior effects such as inflation. You can skip this question if you are not able/comfortable to assess the change.

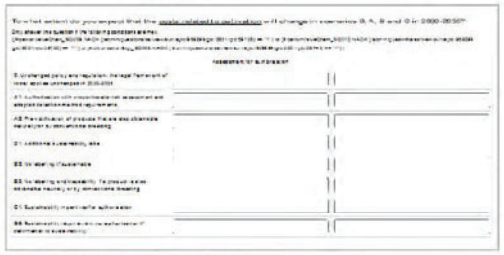
Questions on costs - Costs along the value chain - Other costs



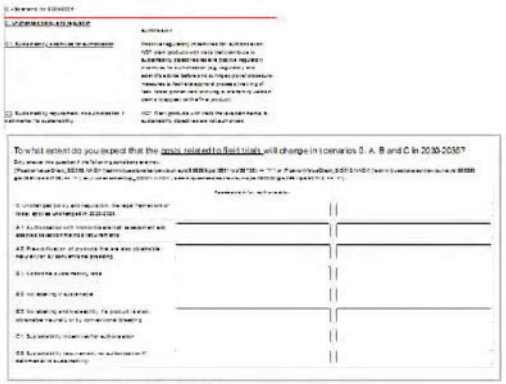
Questions on costs for authorities - Costs related to imports



Questions on costs for authorities - Costs related to cultivation

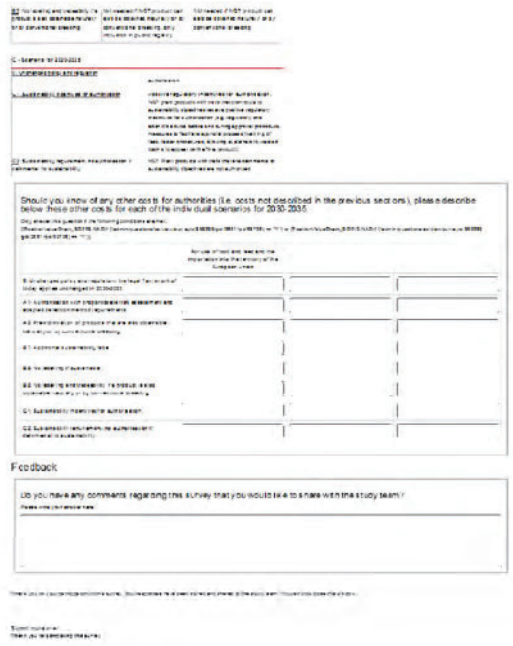


Questions on costs for authorities - Costs related to field trials



To what extent do you expect that the costs related to field trials will change in scenarios 0, A, B and C in 2030-2050?

Questions on costs for authorities - Other costs



Should you know of any other costs for authorities (i.e. costs not described in the previous sections), please describe below these other costs for each of the individual scenarios for 2030-2035.

Feedback

Do you have any comments regarding this survey that you would like to share with the study team?

To: [redacted]@plantum.nl] [redacted]@minlnv.n[redacted]@minlnv.nl] [redacted]
DGMI[redacted]@minienw.nl]; [redacted]@wur.nl]
Cc: [redacted]@hollandbio.nl]
From: [redacted]
Sent: Mon 7/4/2022 3:58:26 PM
Subject: RE: Retail webinar - Schedule and playbook
Received: Mon 7/4/2022 3:58:57 PM
list of participants organizations.xlsx

Hi all,
For your information hereby the list of organizations that registered for tomorrow's webinar.
See you tomorrow in Zoom!
Best wishes,
[redacted]

Van: [redacted]
Verzonden: maandag 4 juli 2022 16:06
Aan: [redacted]@minlnv.nl; [redacted]@minienw.nl' [redacted]
CC: [redacted]; [redacted]
Onderwerp: Retail webinar - Schedule and playbook

Dear all,
Please find below an indication of the schedule of the whole webinar, including an estimation of when you will give your respective presentations.
Please note: **you can already join the Zoom meeting at 14.50, we kindly ask you to do so.**

15.00-15.20	[redacted] **and** [redacted] **kick-off**
15.25-15.35	[redacted]
15.35-15.50	[redacted] **and** [redacted]
15.50-16.15	[redacted] **and** [redacted] **wrap up**

We also kindly ask you **to share your own slides** during the webinar. This way you don't have to say 'next slide' every time which might be nicer. Please do share your slides with either [redacted] or myself before the webinar so we may help in case of technical difficulties. If you join the Zoom already at 14.50h we can do a quick test with slide-sharing in Zoom if you prefer.
If there are any questions, please feel free to contact [redacted] or myself!
Best regards,

[redacted]

[redacted]
+31 6 [redacted]

Plantum

address: Vossenburchkade 68 | 2805 PC Gouda
telephone: +31 182 68 86 68
reg.no.: Rotterdam 24319599
website: www.plantum.nl | www.plant-kracht.nl

follow us on Twitter | YouTube

Organization	Remarks
Bakker Barendrecht	
Bayer CropScience	
Bejo Zaden	
Ciopora	
DLF B.V.	
Euroseeds	
Federatie Nederlandse Levensmiddelenindustrie	
Food Matters Live	
HollandBIO	
Hortuslab	
Hudson River Biotechnology	
Hzpc	
Israel Innovation authority	
Kaveri Seed Company Limited	
KDEnoodt International Consult	
Min. LNV	
Ministerie van VWS (Ministry of Public Health)	
Ministry for Infrastructure and Water Management	
NEN	
Nestlé / ETP Food for Life	
NIBIO	
Nichino Europe	
NWO	
AKDENIZ AGRICULTURAL RESEARCH INSTITUTE	Plant breeder
Republican Centre of Ecology and Local Studies, Belarus	
Rijkzwaan	
SeedWorks	
Unilever Food Innovation Centre Wageningen	
Unilever Nederland B.V.	
Utrecht University	
UvA	
VIGEF	Vereniging van de Nederlands
Winclove	
WUR	

e Groente- en Fruitverwerkende Industrie

To: [redacted] - DGMI [redacted]@minienw.nl]
From: HollandBIO & Plantum
Sent: Tue 7/5/2022 10:22:29 AM
Subject: Participation link for today's webinar on new plant breeding techniques
Received: Tue 7/5/2022 10:23:17 AM

Dear [redacted],

Thank you for registering for the webinar on new genomic techniques. We hope to see you today for an informative and inspiring webinar from 15.00-16.30h CEST.

Go to webinar

Program

During the webinar we will inform you on new breeding techniques and why the ongoing legislative process affects your organisation as well.

[redacted] (Genesprout Initiative) will go over the scientific part of new genomic techniques.

Representatives from the involved Dutch ministeries present the ongoing legislative proces from a governmental point of view.

[redacted] (HollandBIO) and [redacted] (Plantum) present their respective positions on new genomic techniques.

Practical information

Date: 5th July 2022
Time: 15.00-16.30h CEST
Location: **Digital - join via this link**

HollandBIO & Plantum

To: 5.1.2e 5.1.2e @plantum.nl]
From: 5.1.2e - DGMI
Sent: Wed 7/6/2022 11:26:32 AM
Subject: ti verlenging
Received: Wed 7/6/2022 11:26:00 AM

Hoop dat ji jook iets in deze strekking ontvangt! Hier geeft het met de vakanties wel wat meer lucht. Groet, 5.1.2e

"Dear Members of the Standing Committee on Plants, Animals, Food and Feed Section Genetically Modified Food and Feed, Regulatory Committee for Directive 2001/18/EC and Regulatory Committee for Directive 2009/41/EC.
We have received a number of questions from you regarding the targeted survey in the context of legislation for plants produced by certain new genomic techniques.
Specifically, we have been asked by some of you if the deadline of 10th of August can be extended, to take account of account of the holiday period in July and to have enough time to coordinate with all the ministries and authorities involved in each country. We have discussed this with the contractor and we can extend the deadline to the 24th of August. Any extension beyond is not possible as it would mean that there might not be enough time to feed your contributions into the impact assessment analysis. We would kindly ask you to take advantage of this extension only if strictly necessary, and to try to abide by the deadline of the 10th of August for your contributions, in order to facilitate the analysis.
We have also been asked if a PDF version of the questionnaire can be provided in order to facilitate the dissemination of the survey's contents among different ministries and competent authorities that would need to provide input, as well as the organisation in a single reply per Member State. The contractor has informed us that it is possible to download a PDF version of the survey by following a link in the introductory section. Please note however that online survey is designed to address a broad category or stakeholders. The PDF version shows all the potential questions and answer fields to the survey, however some of the questions are designed to be answered only by specific categories of stakeholders that declare to be knowledgeable in specific topics. As such not all questions might be relevant to you. Please bear this in mind when going through the printable version."

To: 5.1.2e 5.1.2e @cbl.nl] 5.1.2e 5.1.2e @groentenfruithuis.nl]; 5.1.2e 5.1 5.1.2e @fnli.nl]; E 5.1.2e 5.1.2e @fnli.nl]
Cc: 5.1.2e - DGMI 5.1.2e @minienw.nl] 5.1.2e @minlnv.n 5.1.2e @minlnv.nl]; 5.1.2e 5.1.2e @wur.nl]; 5.1.2e 5.1.2e @plantum.nl]
From: 5.1.2e
Sent: Thur 7/7/2022 3:59:18 PM
Subject: Recording (link) webinar New Genomic Techniques + verzoek meepraten tijdens Beraadsgroep biotechnologie
Received: Thur 7/7/2022 3:59:22 PM

Beste allen,

We kijken terug naar een geslaagde webinar van dinsdagmiddag 5 juli rondom New Genomic Techniques (NGTs).
Voor iedereen die deze heeft moeten missen heb ik hierbij de opname, zodat jullie dit verder kunnen verspreiden binnen jullie netwerk. En nog bedankt dat jullie deze uitnodiging binnen jullie netwerk hebben verspreid!

Op verschillende momenten tijdens de webinar is er een duidelijke oproep aan de voedselketen gegeven om mee te praten in de huidige en toekomstige discussies en ook om aan te sluiten bij de Beraadsgroep biotechnologie die vanuit de overheid (ministerie van Infrastructuur en Waterstaat) wordt georganiseerd (3 a 4x per jaar, datum aankomende sessie dit najaar tbd).
Aan jullie (en jullie achterban) dus hierbij het verzoek: **wie wil er meepraten tijdens de Beraadsgroep biotechnologie?** Indien jullie interesse hebben, geef dit dan door aan 5.1.2e (in CC).

Link for MP4 download (1 week geldig): https://we.tl/t-HQVUiP07LB

- Eerste 15 minuten: 5.1.2e (Plantum) en ikzelf (HollandBIO) startten de webinar met een korte introductie met een aantal vragen aan het publiek. Deze vragen zijn helaas niet zichtbaar in de opname maar worden wel opgelezen. Uit de vragen bleek dat het publiek al best veel over GMO en New Genomic Techniques leek te weten. We stelden ook de vraag "How should transparency on plants produced by NGTs be provided to operators and consumers?". Deze vraag werd heel wisselend beantwoord door de deelnemers en is een interessant onderwerp van discussie met het oog op wat er op EU niveau speelt.
- 15:00 - 35:00: 5.1.2e GeneSprout Initiative) presenteerde wat New Genomic Techniques zijn en waarom het van belang is voor de voedselsector hier meer over te weten.
- 35:00 – 53:00 5.1.2e (Ministerie v IenW) en 5.1.2e (Ministerie v LNV) presenteerden aansluitend het Nederlandse en EU traject rondom de mogelijke herziening van de GMO wetgeving voor deze technieken.
- Het laatste half uur vindt er nog een goed gesprek plaats met de sprekers en overgebleven deelnemers.

Tijdens dit laatste half uur is er gesproken over traceerbaarheid en transparantie, en de complexiteit hiervan.
Het belang werd genoemd van het betrekken van consumenten en het vinden van voordelen die voor hen relevant zijn. Ook de mogelijke bijdrage van NGTs aan wereldwijde uitdagingen kwam aan bod.
Het is nodig om samen op te trekken, om alle stakeholders in de value chain (van veredelaar tot consument) bij de discussie te betrekken, zodat kennis gedeeld kan worden tussen deze partijen.

Voor verdere vragen schroom dan niet om contact met ons op te nemen.

Met vriendelijke groeten,
5.1.2e en 5.1.2e

To: 5.1.2e @minlnv.nl[5.1.2e @minlnv.nl]
Cc: 5.1.2e - DGM 5.1.2e @minienw.nl]; 5.1.2e - DGMI[5.1.2e
From: 5.1.2e
Sent: Tue 7/12/2022 3:28:51 PM
Subject: TER INFO Plantum - reactie impact assessment NGT
Received: Tue 7/12/2022 3:29:04 PM
Plantum references Impact Assessment on New Genomic Techniques.pdf
Plantum response impact assessment NGT 2022.pdf

Hoi 5.1.2e ,5.1.2een 5.1.2e
Hierbij ter info de reactie die Plantum gaat indienen voor de publieke consultatie over NGT, inclusief referenties.
Met vriendelijke groet,

5.1.2e
06 5.1.2e

Plantum

adres: Vossenburchkade 68 | 2805 PC Gouda
telefoon: 0182 68 86 68
KvK: Rotterdam 24319599
website: www.plantum.nl | www.plant-kracht.nl
volg ons via: Twitter | YouTube

References Impact Assessment on New Genomic Techniques

1) Commission Study on NGTs (2021) gmo_mod-bio_ngt_eu-study.pdf (europa.eu) (accessed 30-06-2022)

2) ENGL report (2019) "Detection of food and feed plant products obtained by new mutagenesis techniques" https://gmo-crl.jrc.ec.europa.eu/doc/JRC116289-GE-report-ENGL.pdf (accessed 29-06-2022)

3) Garcia-Alonso, M. et al (2022) The EU's GM crop conundrum, EMBO reports e54529 | 2022

4) Jorasch, P. (2020) Potential, Challenges, and Threats for the Application of New Breeding Techniques by the Private Plant Breeding Sector in the EU; Front. Plant Sci., 2020 | https://doi.org/10.3389/fpls.2020.582011

5) Euroseeds (2018) Plant Breeding Innovation - Applying the latest Plant Breeding Methods for the benefit of sustainable Agriculture, Consumers and Society https://euroseeds.eu/app/uploads/2019/07/18.1010-Euroseeds-PBI-Position-1.pdf (accessed 01-07-2022)
"Plant varieties developed through the latest breeding methods should not be subject to different or additional regulations if they could also be obtained through earlier breeding methods or result from spontaneous processes in nature. Consequently, genetic variation and final plant products are not covered under the scope of existing GMO regulation if

1. there is no novel combination of genetic material* (i.e. there is no stable insertion in the plant genome of one or more genes that are part of a designed genetic construct) **or**
2. the final plant product contains solely the stable insertion of inherited genetic material from sexually compatible plant species **or**
3. the genetic variation is the result of spontaneous or induced mutagenesis."

* According to the Definition of a living modified organism in Art 3 of the Cartagena Protocol to which the EU and its Member States are a party

6) Voss-Fels K, Stahl A, Wittkop B, Lichthardt C, Nagler S, Rose T, Chen TW, Zetsche H, Seddig S, Baig MM, Ballvora A, Frisch M, Ross E, Hayes B, Hayden M, Ordon F, Leon J, Kage H, Friedt W, Stützel H, Snowdon RJ (2019) - Breeding improves wheat productivity under contrasting agrochemical input levels. Nature Plants 5: 706-714, https://doi.org/10.1038/s41477-019-0445-5
"We demonstrate, in a large-scale study spanning five decades of wheat breeding progress in western Europe, where grain yields are among the highest worldwide, that breeding for high performance in fact enhances cultivar performance not only under optimal production conditions but also in production systems with reduced agrochemical inputs. New cultivars incrementally accumulated genetic variants conferring favourable effects on key yield parameters, disease resistance, nutrient use efficiency, photosynthetic efficiency and grain quality. Combining beneficial, genome-wide haplotypes could help breeders to more efficiently exploit available genetic variation, optimizing future yield potential in more sustainable production systems."

7) Noleppa, S. & Cartsburg, M. (2021) The socio-economic and environmental values of plant breeding in the EU and for selected EU member states HFFA-Research-The-socio-economic-and-environmental-values-of-plant-breeding-in-the-EU.pdf (accessed 28-06-2022)

8) Database on Genome editing Applications that can contribute to sustainability. Genome editing applications were identified in more than 60 different crops with the vast majority in rice, tomato,

maize, soybean, and wheat The traits of the improved crops are diverse and relevant for farmers (e.g., agronomic value) as well as consumers (e.g., nutrition) Most of the genome editing applications are crops with targeted, small genetic changes similar to genetic changes introduced in crops with conventional breeding methods. https://www.eu-sage.eu/genome-search (accessed 01-06-2022) and Dima et al., (2022) Trends in Plant Science: https://doi.org/10.1016/j.tplants.2022.05.002

9) ISF (2018) https://worldseed.org/wp-content/uploads/2018/06/Plant-breeding-innovation-Consistent-criteria-for-the-scope-of-regulatory-oversight.pdf
"The second essential factor affecting the predictability of the policy approach is the process used to determine whether a product is within or outside the scope of existing biotechnology/GMO regulations. The process should be predictable and timely, taking into account existing regulatory mechanisms for improved plant varieties, such as variety registration and national seed laws and regulations. Alignment across countries can be facilitated through alignment of: (a) definitions (b) standard information requests needed to make determinations (c) timelines (d) recognition of other countries' scope decisions Countries should take into account the global impacts that different processes may have on global seed movement, exchange and access to germplasm globally, agriculture, trade and research collaborations."

10) WUR Resource (online)
https://www.resource-online.nl/index.php/2021/09/09/citizens-jury-wants-gene-technology-but-subject-to-conditions/?lang=en
"The citizen's jury was unanimously in favour of new breeding techniques, but ten out of the eleven members did state conditions. The new technology must yield crops that are at least as safe and nutritious as the standard variety. Moreover, the improved plants must serve a recognised social purpose, for example, resistance against pathogens, heat, salt and drought."

Public consultation on plants produced by certain new genomic techniques

Fields marked with * are mandatory.

Introduction

In the last decades, advances in biotechnology have led to the development of new genomic techniques (NGTs), i.e. techniques capable of altering the genetic material of an organism that have emerged or have been developed since 2001, when on the deliberate release of genetically Directive 2001/18/EC modified organisms (GMOs) into the environment was adopted. The Court of Justice of the EU in 2018 clarified that organisms produced by targeted mutagenesis are GMOs subject to the requirements of the EU GMO legislation. Targeted mutagenesis techniques are new genomic techniques, as opposed to &om mutagenesis techniques. Based on the reasoning followed by the Court, the GMO legislation also applies to organisms produced by other NGTs, including cisgenesis techniques.

In November 2019, the Council requested the Commission to prepare a study on the status of NGTs under EU law, & submit, if appropriate in view of the outcomes of the study, a proposal accompanied by an impact assessment, or otherwise inform of other measures required.

The study, published in April 2021, confirmed that NGTs have developed rapidly in many parts of the world & are expected to continue to do so. There is significant interest both in the EU & globally for plant applications of NGTs. & some of their applications are already on the market outside the EU; this trend is likely to continue.

The study also concluded that plants obtained by NGTs have the potential to contribute to the objectives of the European Green Deal&, in particular to the Farm to Fork & Biodiversity Strategies & the United Nations' Sustainable Development Goals (SDGs) for a more resilient& sustainable agri-food system. The study also reported concerns, e.g. on potential safety& environmental impacts, including on biodiversity, coexistence with organic & GM free agriculture& on consumers' right to information & freedom of choice.

Currently, the European Food Safety Authority (EFSA) has concluded that plants obtained by targeted mutagenesis & cisgenesis can have the same risk profile as plants produced with conventional breeding. EFSA has not yet assessed the safety of targeted mutagenesis& cisgenesis in microorganisms or animals, nor the safety of other techniques.

The study concluded that the GMO legislation has clear implementation challenges& requires, current ous legal interpretation to address new techniques& applications, & that there are strong indications that it is not fit for purpose for some NGTs& their products, needing adaptation to scientific & technological progress.

Instructions & glossary

The questionnaire features three sections: section A focuses on the current situation& the definition of the problem, while section B& C are forward-looking & focus on possible solutions& other relevant aspects.

For the purposes of this questionnaire, references to plants obtained by targeted mutagenesis or cisgenesis include their food& feed products.

This questionnaire is available in all EU languages& you can reply in any EU language. You can pause at any time& continue later. You can download your contribution once you have submitted your answers.

Wherever possible, please substantiate your replies with explanations, data& sources of information, practical examples etc.

A short glossary of terminology relevant to this questionnaire follows below:

- **New Genomic Techniques (NGTs):** An umbrella term used to describe a variety of techniques that can alter the genetic material of an organism& that have emerged or have developed since 2001, when the existing GMO legislation was adopted.
- **Mutagenesis:** Creation of mutation(s) in an organism without insertion of foreign genetic material.
- **Classical (or risen) Mutagenesis**: An umbrella term used to describe older techniques of mutagenesis that have been used since the 1950s; they involve irradiation or treatment with chemicals in order to produce&om mutations, without insertion of foreign genetic material. Organisms obtained with such techniques are GMOs that are exempted from the scope of the EU GMO legislation.
- **Targeted Mutagenesis:** An umbrella terms used to describe newer techniques of mutagenesis that induce mutation(s) in selected target locations of the genome without insertion of foreign genetic material.
- **Cisgenesis:** Insertion of foreign genetic material into a recipient organism from a donor that is sexually compatible (crossable).
- **Transgenesis:** Insertion of foreign genetic material into a recipient organism from a donor organism that is sexually incompatible.
- **Trait:** For the purposes of this document, a trait is a specific characteristic resulting from the modification of a plant by targeted mutagenesis& cisgenesis.

A. Regulating plant produced by targeted mutagenesis & cisgenesis - current situation

The EU GMO legislation applicable to plants includes Directive 2001/18/EC on the deliberate release into the environment of GMOs, Regulation (EC) No 1829/2003 on GM food& feed & Regulation (EC) No 1830/2003 concerning the traceability & labelling of GMOs& their food & feed products. The 2010-2011 evaluations of the GMO legislation& the 2021 Commission study on NGTs have indicated that, as regards plants obtained by some NGTs& their products, the current legislation is no longer fit for purpose & needs adaptation to scientific & technological progress. On the basis of these evaluations & the study, the inception impact assessment has identified the following problems associated with the application of the current legislation to plants produced by targeted mutagenesis& cisgenesis:

- Legal uncertainty in Directive 2001/18/EC & other legislation based on it) have been intensified by developments in biotechnology with unclear or undefined terms& notions;
- Current regulatory oversight & requirements are not adapted to their resulting diverse risk profiles, & in some cases can be disproportionate or inadequate;
- The GMO legislation includes authorisation, traceability& labelling requirements that raise implementation & enforcement challenges;
- The current legislative framework does not take into account whether products have the potential to contribute to sustainability.

These problems could impact operators across the agri-food system, including in agricultural biotechnology innovation & research, non-food/feed bio-based & biotechnology industries, operators in EU trade partners, organic & GM-free operators, EU & national authorities, & EU citizens & consumer organisations. The issue is of interest to a broad spectrum of stakeholders, including NGOs active in the environmental protection, agri-food system, biotechnology & consumer protection areas.

1. With regard to the problems above, what is your view of the existing provisions of the GMO legislation for plants produced by targeted mutagenesis & cisgenesis?

They are adequate
They are not adequate
No opinion/I do not know

1.2 This is because
(multiple answers possible)

* the GMO legislation is not sufficiently clear for these plant products
* the GMO legislation includes authorisation, traceability & labelling requirements that are not appropriate for these plant products
* the risk assessment approach of the GMO legislation cannot factor in the diverse risk profiles of plants obtained by targeted mutagenesis or cisgenesis
* the GMO legislation does not take into account whether products have the potential to contribute to sustainability
* of other reasons

For other reasons: Please specify 500 character(s) maximum

* There are no existing detection methods to distinguish between conventional & NGT plants & their conventionally bred counterpart. The existing provisions (e.g. detection & traceability) in the GMO legislation are therefore impossible to implement/enforce regarding imports from non-EU countries that regulate NGT differently (Ref 1.2)
* EFSA concluded that [illegible] NGT plants [illegible] conventionally bred plants. They should therefore not be regulated differently.

496 of 500 characters

2. If plants obtained by targeted mutagenesis & cisgenesis continue to be regulated under the current GMO framework, do you expect short, medium or long term consequences for you/your activity/sector?

* Yes
* No
* Not applicable
* No opinion/I do not know

Please specify potential positive consequences - 800 character(s) maximum

none

Please specify potential negative consequences - 800 character(s) maximum

* Development of NGT plants in the EU is virtually blocked due to the legal uncertainty from a lengthy and expensive approval process, the limited market due to member states opting-out of growing GMOs (Ref [illegible]) & the negative perception by society
* The current regulatory constraints will not enable NGT to contribute to objectives of the Green Deal
* With NGT being regulated differently outside the EU we expect a loss of competitiveness for breeders, particularly SMEs (Ref [illegible]) that are restricted to the EU market, large breeding companies who might move to outside of EU, farmers that will have to compete with imports from outside the EU benefiting from NGT & researchers that will encounter constraints to test their NGT research materials in field trials.

767 of 800 characters

B. Regulating plants produced by targeted mutagenesis & cisgenesis - the future

The envisaged policy action on plants obtained from targeted mutagenesis/cisgenesis will aim at an appropriate regulatory oversight for the concerned plant products, ensuring a high level of protection of human & animal health & the environment, & enabling innovation & the contribution of plants developed by safe NGTs to the objectives of the European Green Deal & the Farm to Fork Strategy. This section aims at identifying potential impacts & possible ways to address the problems acknowledged in the inception impact assessment & mentioned in section A above. Your views will assist us in defining whether the current situation should be changed & the possible way forward.

__RISK ASSESSMENT__

In the current GMO legislation, risk assessment requirements are to a large extent the same for all GMOs. However, EFSA has concluded that plants produced by targeted mutagenesis & cisgenesis generally pose lower risks than plants obtained with transgenesis. EFSA has also concluded that, in some cases, plants produced by targeted mutagenesis & cisgenesis do not pose new hazards compared to plants produced with conventional, non GM breeding techniques, or compared to classical mutagenesis techniques, which are considered as GMOs outside the scope of the legislation & not subject to risk assessment. Finally, EFSA has concluded that off-target mutations potentially induced by targeted mutagenesis are of the same type as, & fewer than, those mutations in conventional breeding.

3. Currently, plants produced by targeted mutagenesis & cisgenesis are risk assessed as any other GMOs. What is your view on their risk assessment?

- Plants produced by targeted mutagenesis & cisgenesis need to be risk assessed using the current GMO legislation requirements
- Plants produced by targeted mutagenesis or cisgenesis need to be risk assessed using requirements adapted to their characteristics & risk profile
- Plants produced by targeted mutagenesis or cisgenesis do not need to be risk assessed when they could have been produced through conventional plant breeding or classical mutagenesis
- Plants produced by targeted mutagenesis or cisgenesis do not need to be risk assessed
- No opinion/I do not know
- Other

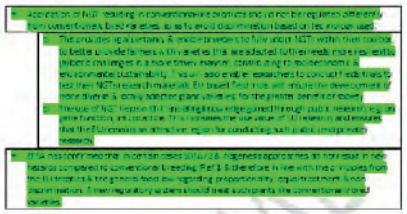
3.2 In your view, which criteria should be used to determine whether a plant produced by targeted mutagenesis or cisgenesis could have been produced via conventional breeding or classical mutagenesis?

500 character(s) maximum

These criteria should be used to verify if an NGT plant is conventional-like and should be regulated similarly: 1) is a novel combination of genetic material i.e. there is no stable insertion in the plant genome of one or more genes that are part of a designed genetic construct, or 2) the plant product [illegible] or 3) genetic variation is the result of spontaneous or induced mutagenesis (Ref 5).

497 of 500 characters

4. Is there any other aspect you would like to mention, for example on the potential economic, social, environmental or other impacts of the above, or would you like to justify/elaborate on your replies?



1365 of 1500 characters

SUSTAINABILITY

The NGT study Commission has concluded that plants obtained by NGTs have the potential to contribute to the objectives of the European Green Deal, in particular to the Farm to Fork& Biodiversity Strategies & the United Nations' SDGs for a more resilient & sustainable agri-food system. Examples of potential benefits include plants more resistant to pests, diseases& the effects of climate change (e.g. notably increasing severity & frequency of extreme heat waves, droughts& rainstorms) or environmental conditions in general, or requiring less natural resources& fertilisers. NGTs could also improve the nutrient content of plants for healthier diets, or reduce the content of harmful substances such as toxins & allergens.

5. Should the potential contribution to sustainability of the modified trait or a product be taken into account in new legislation on plants produced by targeted mutagenesis or cisgenesis?

- There is no need for specific regulatory provisions on sustainability in this context
- Specific regulatory provisions for sustainability should be included in this context
- No opinion/I do not know

Please explain why 500 character(s) maximum

449 of 500 characters

6. In your view, which of the following traits are most relevant for contributing to sustainability?

	Strongly agree	Tend to agree	No opinion/I do not know	Tend to disagree	Strongly disagree

*Enhanced resistance to biotic stresses (e.g. plant diseases caused by nematodes, fungi, bacteria, viruses, pests)	☒	☐	☐	☐	☐
*Enhanced resistance to abiotic stresses (e.g. to climate change or environmental conditions in general, such as drought, heat, cold, salt)	☒	☐	☐	☐	☐
*Better use of resources (such as water, nitrogen)	☒	☐	☐	☐	☐
*Tolerance/resistance to plant protection products such as herbicides or insecticides	☐	☒	☐	☐	☐
*Better yield or other agronomic characteristics (e.g. yield stability, more or larger seeds or fruits, greater height, better shape or flowering time, better breeding or harvest index)	☒	☐	☐	☐	☐
*Better storage performance (e.g. under the heat, transport or storage conditions, longer shelf-life, non-browning & fewer black spots)	☒	☐	☐	☐	☐
*Better composition (e.g. higher or better content of nutrients such as fats, proteins, vitamins, fibres, lower content of toxic substances & allergens)	☒	☐	☐	☐	☐
*Other quality-related characteristics (e.g. better colour, flavour)	☒	☐	☐	☐	☐
*Production of substances of interest for the feed & non-feed industry	☒	☐	☐	☐	☐

7. In your view, which of the following would be the best incentives to encourage the development of plant products of targeted mutagenesis or cisgenesis with traits contributing to sustainability?

	Strongly agree	Tend to agree	No opinion/I don't know	Tend to disagree	Strongly disagree
*Regulatory & scientific advice before & during the approval procedure	☐	☒	☐	☐	☐
*Measures to facilitate the approval process (saving of fees, faster procedures)	☐	☒	☐	☐	☐
*Allowing sustainability-related claims to appear on the final product	☐	☒	☐	☐	☐

Please specify any other incentives you would like to propose:

[redacted]

335 of 500 characters

8. Do you think information about the sustainability contribution of a modified trait of a plant produced by targeted mutagenesis or cisgenesis should be made available to the consumer?

- Yes
- No
- No opinion/I do not know

9. Is there any other aspect you would like to mention, for example on the potential economic, social, environmental or other impacts of the above, or would you like to justify/elaborate on your replies?

- Regardless of the breeding method, plant breeding is already a net contributor to all three pillars of sustainability (Ref 1, 7)
- Breeding companies must have the choice whether to put forward any sustainability claims: this should not be mandatory
- In addition in the EU, NGTs can be used:
  - To incorporate valuable traits into new varieties in a much faster time frame than previously possible, thereby increasing agricultural diversity & supporting [illegible] cultivated crops
  - By researchers to develop new varieties in a wide range of plant species that can contribute to sustainability e.g. yield stability, nutrient use efficiency, increase agrobiodiversity & promote public-private partnerships
- Farmers would benefit from the use of NGTs in research & breeding, by having access to a wider range of plant species & varieties from which to select according to their needs & conditions. These will consequently also benefit consumers when they can choose from a wider variety of products suited to their needs
- NGTs can contribute to increasing sustainability of all kinds of farming practices, including organic
- To transition to more sustainable agricultural systems, production must be maintained to ensure socio-economic alongside environmental sustainability & to avoid an increase in imports into the EU whereby we would offshore the EU carbon footprint to other regions

1417 of 1500 characters

INFORMATION FOR OPERATORS AND CONSUMERS

Under the GMO legislation, GMOs are traced (documentation with declaration of presence of GMO, GMO unique identifier for all transactions along the food chain, obligation to keep information for each transaction for a number of years) & labelled accordingly.
The GMO legislation includes an obligation for applicants for a GMO authorisation to provide a quantitative detection method that is specific to the product, i.e. it can both detect & differentiate it from other products. In some cases of plants produced by targeted mutagenesis or cisgenesis, analytical methods might be able to detect the product but might not be able to differentiate it from similar plants produced by conventional, non-GM breeding techniques or by classical mutagenesis. This means that in these cases analytical methods might be able to detect the presence of a modified product, without being able to prove that the change was the result of a technique regulated under the GMO legislation.

10. When analytical methods are not available or reliable, effective traceability of plants obtained by targeted mutagenesis or cisgenesis, & of their food & feed products, can be ensured via:

- documentation transmitted through the chain of operators
- public databases/registries
- digital solutions, e.g. block chain

- other means
- No opinion/I do not know

500 characters

> - Traceability should not be applied to conventional-like NGT plants, so as not to discriminate between like products.
> - It is not possible for a detection method to differentiate like products based on the breeding method used. Therefore traceability cannot be enforced, particularly in light of international trade, i.e. imports from non-EU countries that might contain products from conventional-like NGT plants that are regulated as conventional in the country of origin.

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11. When reliable analytical methods that can both detect & differentiate a product cannot be provided, operators wishing to introduce plants produced by targeted mutagenesis or cisgenesis in the market should:

- not be asked at all to provide an analytical method that can both detect & differentiate their product
- not be asked to provide an analytical method that can both detect & differentiate their product, if they can justify that this would be impossible
- be asked to provide a detection method, but without the need to differentiate, if they can justify that the latter would be impossible
- not be allowed to place the product in question on the market
- No opinion/I do not know

12. Transparency for operators & consumers, on plants produced by targeted mutagenesis or cisgenesis:

- can be achieved via a physical label on the final product
- can be achieved via a digital label accessible through the final product (e.g.
- link to a website, QR code)
- can be achieved via information available elsewhere (e.g. a website, a public
- database/register)
- is not necessary for plants produced by targeted mutagenesis & cisgenesis, when they could have been produced through conventional plant breeding or classical mutagenesis
- is not necessary for any plant produced by targeted mutagenesis & cisgenesis
- No opinion/I do not know

Note that plants produced with conventional non-GM breeding techniques, or with classical mutagenesis (GMOs exempted from the scope of the legislation), do not need to be traced or labelled as GMOs; other legislation provisions on traceability & labelling apply, e.g. under EU food legislation

13. Is there any other aspect you would like to mention, for example on the potential economic, social, environmental or other impacts of the above, or would you like to justify/elaborate on your replies?

> - Since there are no detection methods available, we cannot distinguish between conventional and NGT plants. Separating production streams, as a consequence of traceability measures, would significantly increase costs, thus discriminating against NGT products as opposed to conventional products.
> - Transparency & freedom of choice can be achieved by indicating in a public registry, like the EU Common Catalogue, which NGT are used. Farmers & operators can use the information to make informed choices whether to grow NGT plants or not. For instance, all industry [illegible] private certification standards that [illegible] exclude NGT products from their value chains as is already the case for [illegible] non-GMO [illegible] breeding processes. [illegible]

used in the process. This information can then be shared via the Common Catalogue, where all plant varieties of agricultural & vegetable species on the EU market are listed. This information could become public as part of the national catalogue of varieties, as well as the EU Common Catalogue of Varieties (Council Directive 2002/53/EC). This would lead to full public access to information, giving consumers the opportunity to make informed choices.

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C. Other relevant aspects of a new framework

The following questions address other aspects, not covered in the previous sections, that are relevant to a new framework.

14. Which of the following measures do you think would be necessary for future-proof legislation on plants produced by targeted mutagenesis or cisgenesis?

	Strongly agree	Tend to agree	No opinion/I do not know	Tend to disagree	Strongly disagree
*Improving legal clarity in the legislation	☒	☐	☐	☐	☐
*putting in place mechanisms that facilitate easy adaptation to scientific progress	☒	☐	☐	☐	☐
*risk assessment that takes into account the characteristics & risk profile of a final product	☐	☒	☐	☐	☐

Please specify any other measures you would like to propose

500 character(s) maximum

Conventional-like NGT plants do not and should not need to be risk assessed. To facilitate this, Annex I A part 2 of Dir. 2001/18 could be extended to certain NGTs that are conventional-like. Consequently mutagenesis in Annex I B should be added to part 2 of Annex I A. This would provide consistency between Dir 2001/18, Regulation 1829/2003, 1830/2003 & [illegible]. These Regulations already exclude mutagenesis (Annex I B of Dir 2001/18) from the definition of a GMO, rather than merely exempting them.

500 of 500 characters

15. Which of the various measures outlined in section B would be most relevant to co-existence with existing agricultural practices (e.g. conventional, organic)? Are any other measures necessary?

1500 character(s) maximum

- Conventional-like NGT plants that meet the criteria stated in Q7.2 are suitable for all types of agriculture, including organic agriculture. No specific measures or co-existence measures are needed.
- Private certifications systems already exist to exclude certain breeding methods or products from specific origins from a dedicated production stream. Such systems could be set up to exclude NGT plants & their products, if desired. Transparency is essential to provide freedom of choice to all operators, in order to promote the use of NGTs in plant breeding. It is essential for transparency not to come at an additional cost, or to lead to discrimination between the products. We therefore suggest to include information about the use of NGTs in a public register like the EU common catalogue. This can be done during the registration process, at no additional burden or cost.

16. Do you think any regulatory measures should be included in new legislation to facilitate access to targeted mutagenesis or cisgenesis technologies/plant genetic resources?

Note that this initiative on plants produced using targeted mutagenesis or cisgenesis does not cover intellectual property rules (e.g. plant variety rights, biotechnology patents)

1154 of 1500 characters

17. Do you think any regulatory measures should be included in new legislation to facilitate the uptake of these technologies by small & medium-sized enterprises?

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18. You can raise any additional points or provide further information & evidence to support your views using the field below.

toolbox, to provide improved starting material capable of withstanding harsh environments due to e.g. climate change.

- It is important that future legislation is easily adaptable to the newest scientific insights, in order for the EU to remain a frontrunner of scientific innovation and excellence. Plant breeding is an ever-evolving field of science resulting in more knowledge and better tools.
- A level playing field must be ensured. There has to be alignment between member states to ensure predictability of market. The current opt-out systems for GMOs should not be applied to NGTs likewise.
- The application of criteria in Q3.2 should bring the EU's regulatory approach in line with those of a growing number of countries around the world, reflect scientific knowledge & technical progress since the publication of the GMO legislation & should be proportionate to risk. Given the particularities of the EU Common Market & the free movement of goods (i.e. seeds), it is essential to have an efficient & robust framework that is directly applicable in all Member States & thus ensures a similar application to the benefit of an [illegible] and facilitates [illegible] and [illegible] trade.
- NGTs have the potential to contribute to the transition to more sustainable food systems. Studies show consumers accept the use of NGTs in light of current challenges e.g. climate change, overpopulation, as long as they provide societal benefits e.g. sustainability, reducing world hunger & do not lead to monopolies (Ref 10). This can only be assured if conventional-like NGT plants are regulated like conventionally bred plants. Any additional burden, whether financial or administrative, will lead to SMEs & start-ups being excluded from the NGTs market due to limited resources.

If you wish to provide additional information which complements your responses, you can upload a document here. The maximum file size is 1 MB. Provision of a document is optional.

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From: 5.1.2e
Sent: Tue 7/26/2022 9:20:30 AM
Subject: NGTs: publieke consultatie
Received: Tue 7/26/2022 9:20:37 AM
MVO contribution to DG Sante's Public consultation on plants produced by certain NGTs.pdf
MVO submission to IAA NGTs final.pdf

Dag 5.1.2e en 5.1.2e
Zoals eerder toegezegd, zend ik jullie bijgaand de MVO-bijdrage aan de DG Santé consultatie m.b.t. NGTs. Ik wil jullie verzoeken om dit exemplaar met contactgegevens (niet zichtbaar op de DG Santé site) niet verder te verspreiden. Voor de volledigheid heb ik onze eerdere bijdrage bij het zogenaamde Inception Impact Assesment ook toegevoegd.
Het is mij vanwege de enorme hoeveelheid aan reacties niet gelukt om de bijdrage van de Nederlandse overheid bij deze consultatie via de DG Santé site te achterhalen. Mochten jullie de mogelijkheid hebben om deze Nederlandse bijdrage te delen dan zou mij dat veel tijd besparen.
Mogelijk ten overvloede, maandag jl. heeft Politico nog een beknopt artikel (zie hieronder) gewijd aan de NGT-ontwikkelingen. buiten verzoek zou ik graag met jullie van gedachten wisselen over de procedurele voortgang en de te verwachten ontwikkelingen.
Met vriendelijke groet,

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BRUSSELS FACES SCRUTINY OVER GMO RULE REVIEW: The Commission is now reviewing the results of consultations that will inform its decision to potentially create fresh rules for so-called new-genomic techniques (NGTs) used to bioengineer crops. But already it's facing scrutiny over its potential plans.

Refresher: Brussels is considering a new legal framework for NGTs, which could be separate from the existing GMO rules they now fall under. Some argue current laws hinder innovative techniques that could be used to help combat climate change, but many green groups are also skeptical of their impacts. Explainer here.

Now what? The Commission ran a public consultation on NGTs that ended Friday. Meanwhile, a consultancy hired by Brussels to conduct an eventual, related impact assessment has been circulating a separate survey with select stakeholders, with a deadline at the end of July.

Seven paths: The stakeholder survey, seen by Morning Agri, asks respondents to evaluate seven policy scenarios — with options ranging from applying the same GMO legislation to NGTs to scrapping requirements on criteria like labeling and traceability. One of the scenarios will eventually become part of the future impact assessment.

But laying out all of those options has already generated controversy.

"It's true that the Commission hasn't yet made a final decision on which scenario it will eventually go with, but the very fact

that deregulation is one of the options on the table, suggests they are seriously considering it. They wouldn't be including it otherwise," said one Parliament insider. "[Publicly], the Commission has always rejected the term 'deregulation' but the detailed policy scenarios show another picture — that full deregulation of some GM crops is a realistic option."

Potential loophole? The insider added that this exemption would apply to genetically modified crops that, as the Commission puts it, "could also be obtained naturally or by conventional breeding."

"And this is pretty horrendous if you ask me — this is not science-based," they said. "The industry could come in and say that this or that NGT could have occurred naturally, and just like that it would no longer be subject to regulation."

Brussels' rebuttal: A Commission official denied that deregulation is being explored as a realistic possibility. "The Commission has included a policy option whereby certain products obtained by NGTs in the scope of the initiative, [i.e. those] that could also be obtained naturally or by conventional breeding, would not be subject to current requirements, but they would still be subject to regulatory oversight," the official said.

The official said the Commission will use the feedback to assess the potential positive and negative impacts of a "whole range of approaches, [and] on this basis … decide whether the current legal framework is to be maintained or a new framework should be proposed for [NGT] products."