To the attention of the Director General of DG Health and Food Safety (SANTE)

Dear Director General,

Copa and Cogeca welcome the Commission’s proposal for a regulation on new genomic techniques (NGT) and the proposals for a regulation on plant and forest reproductive material (PRM/FRM). These pieces of legislation are closely linked. The proposed regulation on NGT plants is sufficient in itself to give European farmers access to improved plant reproductive material. PRM and FRM must be tested, inspected, certified and registered before being placed on the EU market and sold to farmers, who may choose to grow them.

Copa and Cogeca support the Commission’s proposals but have a few amendments to propose.

Copa and Cogeca advocate for amendments to the Commission proposal on NGT as follows:

a) Category 1 NBT plants - The proposed criteria in annex I must be refined to take better account of the genetic specificities of each plant species and traits that are under the control of many genes.

b) Labelling of category 1 NBT variety bags is not relevant for end consumers. Provisions relating to “NGT cat 1” labels on seed bags must be removed.

c) The proposed sustainability criteria that incentivise category 2 NBT plants contradict the sustainability characteristics of the Value for Sustainable Cultivation and Use in PRM Regulation. The sustainability criteria set in Annex III must be harmonised between NGT and PRM regulations.

d) The proposal falls short of the objective of full European harmonisation of the rules of coexistence for category 2 NBT plants. This approach would create considerable legal uncertainty and also contradict the basic idea of a European level playing field.

e) The procedure for the testing of category 1 NBT currently falls under the GMO Directive. Taking this into account, derogation from GMO provisions on the testing of category 1 NBT plants in laboratory is necessary. This is in order to accelerate European farmers’ access to the use of better performing varieties.
The PRM and FRM proposals are very important regulations as they will set the rules for the marketing of PRM and FRM over the next decade.

Copa and Cogeca advocate for amendments to the Commission proposals on PRM/FRM as follows:

a) Update the list of species covered by the regulations
b) Keep the categories of PRM and the possibility of grades
c) Considering wine classification
d) Additional checks on e-commerce
e) Maintaining official controls under PRM/FRM, not in the horizontal legislation
f) Limiting size of derogations
g) Herbicides tolerant varieties/pest resistance/unfavourable agronomic effects: How to control implementation?
h) Re-establishing seed statistics.

You will find in the annex the Copa and Cogeca position paper on new genomic techniques, SEM(23)04027, and on plant and forest reproductive materials, SEM(23)04037.

Copa and Cogeca call on co-legislators to come to a final agreement on these proposals before the election. We very much hope that the concerns of European farmers and agri-cooperatives will be taken into consideration.

Yours faithfully,

On behalf of

*The position papers are available also on Copa-Cogeca Website in all Copa-Cogeca languages.*