

POSITION PAPER

The European Landowners' Organization's (ELO) Perspective on the Proposal for a Regulation on New Genomic Techniques (NGTs)

The European Landowners' Organization (ELO) welcomes the publication of the Proposal for a Regulation of the European Parliament and the Council on plants obtained by certain new genomic techniques and their food and feed, and amending Directives 68/193/EEC, 1999/105/EC, 2002/53/EC, 2002/55/EC, and Regulation (EU) 2017/625

This paper offers the ELO view of the opportunities and challenges lying ahead. It is offered as constructive commentary on the way forward from the perspectives of European landowners and managers.

The European Landowners' Organization (ELO) is pleased to present its position on the European Commission's proposal for a Regulation on New Genomic Techniques (NGTs). ELO recognizes the potential of NGTs in offering precise and efficient breeding techniques while upholding environmental protection, animal health, and consumer safety. This position paper aims to provide an overview of ELO's stance on key aspects of the proposal.

Precautionary Principle and Robust Framework

ELO warmly welcomes and commends the inclusion of the precautionary principle in this proposal. We appreciate the efforts of renowned institutions such as the Joint Research Centre (JRC) and the European Food Safety Authority (EFSA) in conducting extensive studies and engaging in comprehensive public consultations. The thorough impact assessment demonstrates the alignment of policy options with the precautionary principle, ensuring a robust framework that safeguards safety and adequately addresses potential risks associated with NGTs.

Notification Procedure as the Preferred Approach

From ELO's perspective, the notification procedure stands as the most favourable approach for regulating (especially Category 1) NGTs. This method effectively ensures safety while maintaining proportionate requirements based on risk assessment. The notification procedure simplifies the application process, reducing administrative burdens for both applicants and authorities. ELO believes that this option holds the highest potential for fostering the contribution of NGTs to the sustainability of the agri-food system. It also benefits SMEs by minimising costs, enhancing competitiveness, and facilitating trade.

However, ELO emphasises the need for more details on the notification procedure and its key elements to ensure a swift implementation of the regulation. A clear and transparent notification process is crucial for breeders to understand their obligations and responsibilities which will eventually translate into farmers' quicker access to these tools. By providing adequate guidance and support, the European Commission can facilitate the effective utilisation of NGTs while ensuring compliance with safety and environmental standards.

Authorization Procedure and Risk Assessment

ELO acknowledges the necessity of implementing an authorization procedure with tailored risk assessment for NGT plants not covered by the notification procedure. By adjusting data requirements for risk assessment, this approach strikes an appropriate balance between safety and proportionality. Introducing regulatory incentives will guide the development of NGTs towards traits that possess sustainability potential, thereby supporting the competitiveness of SMEs. ELO recognizes the importance of this authorization procedure in fostering responsible innovation and sustainable practices within the NGT sector.

Proportionate Costs and SME Access

The EU should work closely with Member States to ensure that the authorization and notification procedures have proportionate costs for breeders. This approach is vital to enable small and medium-sized enterprises (SMEs) to access the market and compete on a level playing field. By reducing administrative and compliance costs, the European Commission can enhance SMEs' competitiveness and foster innovation within the NGT sector. ELO recognizes the importance of supporting SMEs in this field to drive responsible innovation and sustainable practices.

Labelling and Traceability

ELO strongly advocates for maintaining the integrity of organic production and consumer trust. Therefore, we welcome the labelling of seeds (PRM/FRM) containing or consisting of NGTs, as it enables proper traceability and transparency. Through clear labelling requirements, potential contamination with organic production can be minimised, allowing consumers to make informed choices. ELO believes that an effective labelling system with functioning traceability will contribute to the coexistence of different production methods and foster consumer confidence in NGT-derived products.

The European Landowners' Organization (ELO) supports the European Commission's proposal for a Regulation on New Genomic Techniques. ELO believes that NGTs can provide more precise and efficient breeding techniques while maintaining a high level of protection for the environment, animal health, and consumers. By focusing on the notification procedure, labelling and traceability, proportionate costs, and responsible innovation, the proposed regulation can pave the way for the sustainable development and market accessibility of NGTs. ELO encourages the European Commission, the European Parliament and the Council of the EU to consider these arguments in the upcoming debates in order to ensure a comprehensive and balanced regulatory framework that promotes the responsible, efficient, and sustainable use of NGTs in Europe.