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On the future regulation of New Plant Breeding Techniques – an opportunity for farmers, consumers, and the climate/environment

European food production is under pressure. Climate change is already causing extreme weather events such as droughts, floods, and storms. At the same time the Russian war on Ukraine has revealed the vulnerability of our supply chains and our dependency on a few trading partners to provide European farmers with inputs such as energy and fertilizers.

We, the signatories of this letter, recognise these huge challenges. Europe needs to enhance its production of healthy and sustainable food. At the same time, we need to ensure that European farmers are competitive on the global market. We cannot afford to leave any stone unturned in this endeavour. One important way forward is the possibility to use the new precision plant breeding tools to develop the crops for European farmers.

We recognize there is both public and political reluctance to the introduction of new technologies, and especially gene technologies. We do, however, strongly encourage the European Commission to propose a solution that brings the European Union out of the deadlock created by the [ECJ ruling C-528/16](#).

We do not expect, or even advise, a complete deregulation or revision of the existing legislation in this area. Instead, we propose that the European Commission carefully considers what kind of techniques could make a real difference and presents a targeted revision of the existing legislation.

In our view the precision breeding techniques that creates targeted mutations within the existing genes of the crop - similar to the mutations that occur in nature - are the most promising and therefore most pressing to enable. Mutations are the driving force in the natural evolution and will bring solutions to many of the major challenges we are facing - crops that are less dependent on fertilizers, less prone to diseases and therefore need less plant protection products and are more resilient to heat, draught and flooding.

New varieties developed by targeted mutations should follow the existing variety registration and testing in accordance with present and future EU seed legislation. It is crucial that registration and marketing of such varieties are not burdened by high costs as this will diminish the availability of new varieties.

Farmers Rights and Breeders Rights according to the CPVR legislation (2100/94) should be respected, to drive the necessary innovation in the European Union.

The simplest way to ensure this is by including mutations generated by precision breeding to the existing mutagenesis exemption in Annex 1B of Directive 2001/18/EC. The modernized rules need to emphasize that the exemption not only applies to the techniques that were known in 2001, but to all mutagenesis techniques including those that create specific mutations in the plants DNA molecule while leaving the rest to the plants own repair-mechanisms without inserting new DNA.

We believe that this amendment, which is also in line with the preliminary opinion of advocate general Michal Bobek of January 18, 2018, will give us a necessary tool but avoid the political challenges of a more comprehensive overhaul of the legislation.

On behalf of the agricultural organisations in the Nordic and Baltic region

Yours sincerely

Juha Marttila

President

The Central Union of Agricultural Producers and Forest Owners (MTK)

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