

## New Genomic Techniques (NGTs)

### Position

***In light of the forthcoming Regulation on New Genomic Techniques (NGTs) announced by the EU Commission on 5 July, Europe's consumer co-operatives hereby call on the EU legislators to uphold the strict regulation and avoid any deviations from the current legislative framework for GMOs, thereby ensuring maximum consumer protection and information by maintaining the precautionary principle. Failure to do so will jeopardise food producers and consumers' rights of informed choice and compromise the sustainability of Europe's food system by supporting industrial food production and monocultures.***

**Consumer protection, information and empowerment** are at the heart of Euro Coop's *raison d'être*, since we represent 20 national organisations of consumer co-operatives with over 30 million individual consumers, who are the member-owners. Our evaluation of the possible impact of new technologies and their products includes the application of the **precautionary principle** and the extent of their contribution to valuable and socially sustainable solutions, consumer freedom and the right of informed choice. In decades past, Euro Coop members have ensured their own brand products as **GE (genetically engineered) free** and have supported the full **regulation of GMOs**, with a clear mandatory **labelling** scheme and a laboratory network to check legal **compliance**.

Euro Coop fully **endorses the Judgement of the European Court of Justice (ECJ) of 2018** that ruled that mutations should have been considered as genetic modifications covered by the Directive 2001/18. Furthermore, NGTs make use of molecules assembled **outside the cell** in a way which **cannot** be expected to happen in nature and that is then forced into the receiving cell akin to GMOs. This qualifies them as transgenic techniques as defined in the Directive's Article 2.2.a and in Annex I A.

Moreover, Euro Coop would like to call upon policymakers to act upon several recommendations.

- Risk Evaluation and Management

NGTs products should undergo systematic **ex-ante** evaluation on health and environmental risks and **ex-post** bio- and socio-vigilance plans implementable through a national network funded by the applicants. The ex-post bio-vigilance should ensure on-site verification of the safety claims while the socio-vigilance network should check the socio-economic impact with a particular focus on agriculture practices, way of living, the structure of the production along the value chain, the different advantages and values shared among stakeholders (*i.e. seed producer, farmer, food industry, suppliers, consumers*).

- Labelling

Euro Coop believes that new NGTs products on the market should be labelled in the same way as GMOs. The utilisation of a QR code system should be considered complementary to a physical label on the products. Anything less would diminish consumers' information, protection, and confidence, as well as traceability.

- Traceability

Traceability should be ensured regardless of how easily the mutation could be detected. Therefore, we believe that applicants must be obliged to disclose the **techniques** used and the **modifications** induced

as key **prerequisites** for being granted permission for commercialization. The disclosed information would allow national reference laboratories to easily detect NGT plants and products.

- Science in Policy

We deem NGTs as techniques that support intensive, industrial, proprietor, monocultural cultivations and a food and feed production **model** that is not in line with our **values** and **ethics**. Yet, we support using science to advance policy and overall sustainability in a responsible manner without jeopardising the health of people and the environment.

We **encourage** improving plant varieties and animal races by applying the **advanced knowledge of genetics and molecular biology** to speed up the selection procedures among progenies obtained through natural breeding (i.e. Marker Assisted Selection, microsatellites, SNPs). To that regard, we think that an open source, no-proprietor biological markers database (i.e. “MAS wheat” by University of Davis, California, USA) could represent a valid model for the development of improved plant and animal varieties at EU level.

- Directive’s Review

Considering the differences among **old** and **new genetic techniques**, Euro Coop believes that the Directive 2001/18 should be **reviewed** to clarify some ambiguous and poorly defined terms, so that the rules are extended to clearly include NGTs among transgenic techniques and their products among GMOs.

The revision should extend the research of unexpected changes and effects of NGTs by supporting a wider use of the so called “omics” sciences and techniques. These changes in legislation are necessary to ensure that NGTs products are **identifiable**.

Likewise, Euro Coop is particularly concerned about the **wide societal implications** linked to the “gene drive” technology and **calls for an urgent definition** of its possible application in organisms deemed to be released in an open environment, particularly in endemic areas of targeted species.

- Sustainability Criteria

A clear **distinction** must be kept between NGTs’ **sustainability** potential and its **risks assessment** whereas the former shall not influence the latter. Sustainability criteria could be useful to drive scientific research, political decision, market application but they should come only after a positive risk evaluation and once the permit is granted.

We stress the importance to guarantee a fair regime for **intellectual property** (i.e. no industrial patents) and the need to apply the same measures to imported NGTs and their products.

### Concluding Remarks

Euro Coop shall continue to stand for maximum consumer protection, environmental protection, and the upholding of ethical practices, because we deem these aspects fundamental for any responsible economic endeavour and essential for the establishment of sustainable food systems.

### About Euro Coop

*Euro Coop unites 20 national organisations of consumer co-operatives in Europe, representing 30 million consumer-members, 7.500 local co-operatives, 750.000 employees and operating 94.000 points of sale. Consumer co-operatives are enterprises with a distinct model of ownership and governance, which, since 1844, have been operating according to the co-operative principles such as voluntary and open membership (Principle 1) and democratic member control (Principle 2) based on the rule of 1 member-1 vote. Being owned and managed by their members, consumer co-operatives have an inherent responsibility far-reaching past the cash register, such as care for the community (Principle 7) and all its social, economic and environmental facets.*