



PFP position on the New Genomic Techniques (NGTs)

PFP represents the European primary food processing industry, a vital link in the food chain, efficiently delivering high-quality and safe food for its customers and consumers. The primary food processing industry uses around 220 million tonnes of agricultural raw commodities (cereals, sugar beet, rapeseeds, soybeans, sunflower seeds, crude vegetable oils, starch potatoes, cocoa beans...) a year, employing over 120,000 people in Europe.

PFP has welcomed the European Commission proposal for a Regulation on plants obtained by certain new genomic techniques and their food and feed published in July 2023 and has contributed, so far, to the ongoing debate in the European Parliament and Council. In particular, PFP welcomes the distinction between plants deriving from targeted mutagenesis and cisgenesis from transgenic GMO plants. PFP supports the creation of Category 1 for NGT plants and products that could have also emerged from conventional breeding methods or occur in nature and the recognition that these NGT plants and derived products are ‘conventional-like’.

In view of the upcoming trilogues, PFP would like to underline the following critical points for ensuring a workable and proportionate legal framework for plants obtained by new genomic techniques (NGTs) and their products.

Transparency and labelling - PFP values transparency as a key element of the proposal. In line with our past positions, we support the inclusion of relevant information in public databases and registers, which is sufficient to ensure transparency. We also support that any plant or product recognised as ‘conventional-like’ should be covered by a similar legislative framework like the one applying to conventional plants and products. In this frame, PFP strongly supports the Commission’s proposal that conventional-like NGT plants and their derived products will be exempted from the GMO directive requirements of mandatory labelling and traceability. Introducing such requirements would *de facto* result in the segregation of Category 1 NGT-derived products from conventional ones, creating unjustified barriers to their development and uptake, and impeding the development of NGT varieties for several sectors. This would severely hinder the potential of NGTs in contributing to innovation, sustainability, and food system resilience, putting the EU’s food security at risk.

Verification procedure - In the Commission’s proposal, a verification process is set for Category 1 plants that are considered equivalent to plants produced by conventional breeding. While this process appears rather straightforward, it is crucial that, in parallel, it ensures 1) Harmonised approach and implementation across Member States to avoid fragmentation and 2) Clear understanding that it should remain a verification procedure that does not create unnecessary administrative burden.

Regulatory coherence should be ensured - We look forward to the proposal achieving regulatory consistency and coherence not only within the EU but also at the international regulatory level.

PFPP remains committed to continue engaging with EU Institutions and urge them to swiftly adopt a much-needed EU legal framework for NGT plants and derived products.

The **Primary Food Processors of the EU (PFPP)** is composed of:

European Committee of Sugar Manufacturers ([CEFS](#))

European Cocoa Association ([ECA](#))

European Flour Milling Association ([European Flour Millers](#))

European Starch Industry Association ([Starch Europe](#))

European Vegetable Protein Association ([EUVEPRO](#))

European Vegetable Oil and Proteinmeal Industry ([FEDIOL](#))

PFPP members process approximately **220 million tons of raw materials** (cereals, sugar beet, rapeseeds, soybeans, sunflower seeds, crude vegetable oil, cocoa beans, starch potatoes...) **employing over 120 000 people** in the European Union.