EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Deputy Director General for Food Sustainability Responsible for Directorates E, F and G

Brussels
SANTE.E.3/TW/nn (2023) 2939703

Dear Ms Bozki, dear Ms Sumner,

Subject: Your letter of 2 March 2023 – New Genomic Techniques and Pesticides

I refer to your above-mentioned letter ([1]) concerning new genomic techniques (NGTs) and pesticides and thank you for sharing your new report.

In your letter, you challenge the view that NGTs could play a role in the reduction of pesticide use in the European Union and assert that there is not a single trait near commercialisation which has the potential to reduce pesticide use. Instead, in your report your recommend other strategies to reduce the use of pesticides in agriculture.

With regard to the role that NGTs could have in the reduction of pesticide use, resistance breeding has contributed to crop productivity and plant disease management and will continue to be a basic prerequisite for mitigating potential pesticide risks. Plant breeding is a long and complex process, which mi[redacted]le to keep pace with the rapid evolution of pathogens or the emergence of new pests – processes that are accelerating driven by globalisation and climate change. NGTs provide considerable potential to increase the speed and technical opportunities in the development of resistant varieties. While a number of scientific trials, for example in rice and in potatoes, confirm this potential, we fully agree that the potential of varieties with improved biotic resistance is put to its best use in combination with improved agronomic practices, that is, resistant varieties are one

([1]) Our reference Ares(2023)1547382

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component in a system-wide adaptation under the principles of integrated pest management.

Regarding the traits under development, the report of the Commission's Joint Research Centre on current and future market applications of new genomic techniques ([2]) identified 16 applications in plants at a pre-commercial stage in the pipeline that could reach the market in the short term (within 5 years). A significant proportion of applications of NGTs in the early and advanced R&D stage (arrival on the market by 2030) target resistance to many types of pathogens and pests and have the potential to contribute to pesticide reduction. Furthermore, field trials have already been carried out in the EU ([3]) to test traits conferring tolerance to biotic stresses.

In your report, you also raise the issue of patents and express concerns about risks of corporate control of NGTs. While the NGT initiative does not concern rules on the protection of intellectual property rights (IPR), the Commission is aware of the concerns relating to the application of the IPR legislation as regards NGT plants. These concerns are being carefully considered, and, if appropriate, possible solutions will be sought together with other Commission services to contribute in particular to the access of farmers to seeds and of breeders to patented genetic material.

Finally, the Commission is taking action to reduce the risks and use of pesticides, e.g., through the proposal on the sustainable use of pesticides, which is currently debated in the Council and the European Parliament and we have taken good note of the proposals in your report in this regard. This, together with the NGT initiative, is part of the various actions to achieve the objectives of the European Green Deal and Farm to Fork Strategy.

Yours sincerely,

Claire BURY

([2]) Parisi, C. & Rodriguez Cerezo, E., 2021. Current and future market applications of new genomic techniques, doi:10.2760/02472

([3]) https://webgate.ec.europa.eu/fip/GMO_Registers/GMO_Part_B_Plants.php