

To:

Ursula von der Leyen, President of the European Commission  
Frans Timmermans, European Commissioner, European Green Deal  
Janusz Wojciechowski, European Commissioner, Agriculture  
Stella Kyriakides, European Commissioner, Health and Food Safety

30 January 2020

Dear President,  
Dear Commissioners,

***On behalf of the European Sustainable Agriculture through Genome Editing network (EU-SAGE)<sup>1</sup> we call upon the European Commission to safeguard genome editing for sustainable agriculture and food production.***

The world faces important sustainability challenges. Climate change is a pressing issue. Your European Commission has fully recognized these challenges and has formulated an ambitious **European Green Deal** in response. As scientists we welcome the Green Deal and commit to play our role in generating knowledge and tools that help achieve the transition to a green economy.

One important area is the sustainability of our agriculture and food production. In order to achieve our ambitions, we need to make agriculture and food production more efficient, decrease its greenhouse gas emissions, and make our food crops much more resistant to climate stress such as drought. To achieve this, a combination of approaches will be necessary, one of which needs to focus on the genetics of the crops that we grow. By improving the genetics of crops – a process that has been ongoing since the start of organized farming – it is possible to achieve new crop varieties that require **less (chemical) inputs**, have **higher and more stable yields**, are **better adapted to climate change**, and are **healthier or more nutritious**. Scientists and plant breeders are working on these new varieties and are using a growing collection of breeding tools. These tools have evolved to become much more directed, precise and efficient. Genome editing tools such as CRISPR-Cas are a recent addition to the breeders' tool box. They enable the introduction of important properties into crops in a very efficient way.

**It is our firm conviction that Europe should be able to use genome editing techniques where they contribute to a more sustainable agriculture and food production.** In contrast to many different countries world-wide, in Europe however, the current regulatory policies *de facto* block the application of genome editing in agriculture. This is because the European legislation is being interpreted to mean that genome edited crops are subject to the GMO regulatory provisions, also in cases where the edit is not different from what is present in nature or can be achieved by conventional breeding methods. The latter makes no sense from a scientific point of view and shows that the current EU GMO legislation is no longer fit for purpose. The European regulatory policies also differ significantly from those in many other parts of the world, where such edited organisms are not subject to GMO regulatory provisions. These differences will create important problems in international trade.

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<sup>1</sup> EU-SAGE is a network representing 129 European plant science institutes and societies that have joined forces to provide information about genome editing and promote the development of European and EU member state policies that enable the use of genome editing for sustainable agriculture and food production.

By means of Council Decision 2019/1904 of 8 November 2019, the European Commission has been requested to produce a study on the status of novel genomic techniques under EU law, and to submit a proposal, if appropriate in view of the outcomes of the study. We are committed to submit the necessary scientific information and any other evidence relevant for this study. Given the situation described above we believe a regulatory proposal is necessary that would harmonize the European legislation with that of important other parts in the world and enable the use of genome editing for sustainable agriculture and food production.

**Europe cannot afford to miss out on the important opportunities that genome editing offers for sustainable agriculture and food production. Strong political signals of commitment to solve the current regulatory deadlock are necessary to prevent irreversible damage to our European economy and to the transition to a green economy.**

EU-SAGE also requests to the European Commission to be included in the list of EU recognized stakeholder organizations that are going to be consulted as part of the study on the status of novel genomic techniques under EU law. EU-SAGE is registered in the EU transparency register under number 030272137138-11.

Yours sincerely,

[REDACTED]  
[REDACTED] EU-SAGE network  
[REDACTED] VIB-UGent Center for Plant Systems Biology

c.c. [REDACTED] Biotech unit, DG SANTE