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"Biotechnology"  
DG SANTE/E/3  
European Commission

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**Ref: stakeholder consultation on the status of new genomic techniques under Union law**

Berlin, 27 February 2020

Dear ██████████

I am writing to you in my capacity as ██████████ the European Federation Academies of Sciences and Humanities – ALLEA, with reference to the currently ongoing stakeholder consultation on the status of new genomic techniques under Union law (Council Decision (EU) 2019/1904).

ALLEA represents more than 50 academies from over 40 EU and non-EU countries. Since its foundation in 1994, ALLEA speaks out on behalf of its members on the European and international stages, promotes science as a global public good, and facilitates scientific collaboration across borders and disciplines.

ALLEA has a great interest in a solid and forward thinking regulatory framework for genome editing in Europe. In early November of last year, we, together with the Royal Flemish Academy of Belgium for Science and the Arts, as well as with support of the Vlaams Instituut voor Biotechnologie hosted an international symposium on Genome Editing for Crop Improvement in Brussels. A workshop report is forthcoming and planned for publication in the spring.

Since the beginning of the initiative, ALLEA was interested in compiling the current state of knowledge on genome editing in crops, including perspectives from disciplines beyond the life sciences, which will be the case once the workshop report is published and, following on from there, using this report as a basis for an interdisciplinary working group with a view to propose concrete amendments to Directive 2001/18/EC, taking into account the ruling of the EUCJ's on case C-528/16 of 25 July 2018.

Yet, as ALLEA is in and of itself not a research funding organisation, we do not see ourselves in a position to meaningfully contribute to all of the specific matters requested in the above stakeholder consultation. However, we may still contribute on the ethical aspects of genome editing, where we have expertise through our Permanent Working Group on Science and Ethics. Instead, we would like to engage with you, your colleagues at DG SANTE as well as relevant MEPs to present to them the contents and conclusions of our work which we believe are of the highest relevance for the on-going considerations as regards the EU's legislation on the matter.

It is for this reason that I am inquiring whether the European Commission would be willing to work together with ALLEA as partners to convene an expert hearing or breakfast meeting on genome editing, or indeed any format you may consider appropriate.

We stand ready to discuss potential ways forward and would be delighted to hear from you.

With kind regards,

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