

From: PRRI <info@prri.net>
Sent: lundi 11 mai 2020 11:35
To: [REDACTED] (SANTE)
Cc: [REDACTED] (SANTE); [REDACTED] (SANTE)
Subject: Re: EC Stakeholders' consultation on new genomic techniques

Dear [REDACTED],

I follow up on your message below that the NGT consultation targets EU stakeholders and that PRRI is not considered an EU stakeholder because the majority of PRRI members are based in institutions of non-EU-countries.

I confirm that most PRRI members are public sector scientists from non-EU countries, mainly developing countries and countries with economies in transition.

After sharing your message with PRRI members, I received the following questions and observations about the selection process and the survey:

Questions:

- How is 'EU level stakeholder' defined?
- How was the list of targeted stakeholders compiled?
- Why are some international organisations considered 'EU level stakeholders', while others are not?

Observations about the selection process:

- it seems a missed opportunity to exclude organisations such as PRRI, which through the many members from EU countries harbour substantial and experience relevant to the study that the Council requested,
- it seems a missed opportunity to exclude organisations such as PRRI, which through the many members from non-EU countries have experience with non-EU regulations that may be valuable for the study, for example to learn from and compare with regulatory experiences and to understand the impact of choices made in the EU on the potential for public research innovation in developing countries.

Observation about the survey:

The request of the Council was for a study on the status of organisms developed through new genomic techniques under Union Law. However, none of the questions in the survey ask this - open - question. Moreover, several questions seem steer the answers in a certain direction by suggesting that all NGTs are GMOs under Union Law.

I look forward to receiving your replies to these questions and observations.

That said, I also inform you that I will not insist for a third time for PRRI to be included in the targeted stakeholder consulted. Instead, PRRI will share its views on biotechnology and regulation in a letter to the Presidents of the European Commission, the European Parliament, and the European Council.

Very sincerely,

[REDACTED],

[REDACTED] Public Research and Regulation Initiative (PRRI)

[REDACTED]

On Tue, 24 Mar 2020 at 17:46, <[REDACTED][@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)> wrote:

[REDACTED],

Thank you for your email.

As indicated before in our mail of 3 March, we are targeting EU stakeholders with this consultation. To our knowledge the great majority of PRPI and steering committee members are individuals based in institutions of non-EU-countries. If this is not the case, please correct us.

For those PRPI members that work in EU-based universities and institutions, we would suggest to consult the list of participating stakeholders published on our website -and check whether they would be interested to get your contributions.

We hope this is possible for you and thank you very much for your understanding

Kind regards

[REDACTED]

[REDACTED]
[REDACTED]



European Commission
DG Health and Food Safety

Unit E3 – Biotechnology

From: PRRI <info@prri.net>

Sent: Monday, March 16, 2020 9:56 AM

To: SANTE NGT STUDY <SANTE-NGT-STUDY@ec.europa.eu>

Cc: [REDACTED] (SANTE) [REDACTED] [\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu); [REDACTED]
[REDACTED] (SANTE) [REDACTED] [\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)

Subject: Re: EC Stakeholders' consultation on new genomic techniques

Dear [REDACTED],

Thank you for your email.

Following up on the last part of your email, I confirm that PRRI's key interests are not represented by the currently listed participating organisations.

As explained, PRRI's interest lies in public research in modern biotechnology for the common good. Consequently, PRRI also has a deep interest in new genomic techniques.

As a general observation, I believe that the disproportionate low number of organisations with mandates pertaining to public research in modern biotechnology in itself would justify adding multiple organisations such as PRRI to the list.

With regard to PRRI's specific interests:

1) none of the listed organisations look at public research as a whole (e.g. academia, government research institutes, international research institutes) and at genomic techniques as a whole.

2) moreover, while PRRI is indeed active on the EU level, it is also active on the international level and can therefore bring a very relevant perspective to the consultation, i.e. the perspective of public researchers in developing countries on the potential of the various genomic technique to contribute to sustainable development and the impact of EU policies and regulations on public research in developing countries.

I therefore respectfully repeat the request that PRI be included in the list of stakeholders for the Stakeholders' consultation.

Very sincerely

[REDACTED],

[REDACTED] Public Research and Regulation Initiative (PRRI)

[REDACTED]

On Tue, 3 Mar 2020 at 18:24, <SANTE-NGT-STUDY@ec.europa.eu> wrote:

Dear [REDACTED],

Thank you for your email concerning the targeted stakeholder consultation on new genomic techniques.

For your information, the objective of this consultation is to gather information and data to feed into the Commission's study on the status of new genomic techniques. The consultation targets EU-level stakeholder organisations that could be directly or indirectly impacted and/or have potential interest in new genomic techniques. The list of consulted stakeholder organisations has been published on the Commission website (https://ec.europa.eu/food/plant/gmo/modern_biotech/new-genomic-techniques_en).

Even though your organisation is not directly involved in this consultation, we would suggest you to consult the above mentioned list, contact the EU-level stakeholder organisation that best represents your interest, and participate via them in the consultation process.

In case you believe that your interests are not represented by any of the participating EU-level organisations, or that there is an EU-level organisation that in your view is missing from that list, please let us know as soon as possible.

Best wishes

[REDACTED]

[REDACTED]



European Commission
DG Health and Food Safety

Unit E3 – Biotechnology

From: PRRI <info@prri.net>

Sent: Monday, February 24, 2020 11:55 AM

To: SANTE NGT STUDY <SANTE-NGT-STUDY@ec.europa.eu>

Subject: EC Stakeholders' consultation on new genomic techniques



DG SANTE

European Commission

24 February 2020

Re: Request participation PRRI in the EC Stakeholders' consultation on new genomic techniques

Dear [REDACTED] and [REDACTED],

I hereby respectfully request that the Public Research Initiative (PRRI) be included in the list of stakeholders for the Stakeholders' consultation on new genomic techniques.

PRRI is an organisation of public sector scientists active in modern biotechnology for the common good.

The main aims of PRRI are to bring science to the debate on regulations and policies pertaining to modern biotechnology, to highlight the importance of public research and to inform the authorities of regulations and policies that impact the potential of modern biotechnology to contribute to human well-being and sustainable development.

PRRI was established in 2004. In the period 2006 – 2009, the activities of PRRI were funded by the European Commission FP6 project "Science4BioReg". Since its establishment, PRRI has regularly shared its expert views on policy and regulatory matters pertaining to modern biotechnology to the European Commission, the European Parliament and the European Council. Since a couple of years, PRRI has also organised, together with farmers organisations in the so called Farmers- Scientists-Network, yearly events in the European Parliament on research and innovation in agriculture.

PRRI stands ready to elaborate on this request and on its activities.

Very sincerely

[REDACTED],

[REDACTED] Public Research and Regulation Initiative (PRRI)

[REDACTED]