Ref. Ares(2020)2552371 - 14/05/2020

European Commission
Directorate General for Health
and Food Safety (DG SANTE)
[redacted]
Unit E3- Biotechnology
Rue Belliard, 232
B-1049 Brussels

BVLH
Handelsverband
Lebensmittel

Berlin, 14 May 2020

New genomic techniques / position German food retail

Dear [redacted]

in view of the ongoing discussions concerning new genomic techniques (NGTs) we would like to take the opportunity to briefly explain the German food retail sector's general position. The businesses of the German food retail sector have been calling for full transparency for consumers from the very beginning of the debate on genetically modified organisms.

In the past few years new genomic techniques (i.e. CRISPR/Cas) have been developed, which allow carrying out targeted interventions on the genetic material of a cell. The European Court of Justice (ECJ) ruled in its July 2018 judgment that these new procedures must be classified as falling under the applicable EU rules on genetic engineering.

Against this background, the German food retail sector considers that it is crucial to promote the development and provision of detection methods and techniques. Therefore we would like to urge the European Commission to actively pursue and work towards this goal. This applies not least to corresponding products from third countries should they be imported into the European Union.

In our view a regulation of new genomic engineering techniques and the products derived from them would follow the logic of existing European legislation on genetic engineering. It would ensure that these products are also subjected to an authorisation process including a risk assessment. Furthermore labelling and traceability provisions would guarantee that consumers have a choice and are able to take informed and autonomous buying decisions.

The key points mentioned above as well as further details will also be expressed in the replies to the current consultation via our umbrella association Eurocommerce, which we fully support.

Kind regards,

[redacted]

[redacted]

[redacted]

[redacted]

In copy: [redacted], [redacted] German Department for Nutrition and Agriculture