

To: JUELICHER Sabine (SANTE)
Cc: [REDACTED] (JRC-GEEL); [REDACTED] (JRC-GEEL);
[REDACTED] (SANTE); [REDACTED] (SANTE)

Dear Sabine,

Thank you for your Note Ares(2018)5741572 of 09 November, in which you ask for further clarification on the ENGL Report "Detection of food or feed obtained by new mutagenesis techniques" which is now under preparation.

Indeed this report will be directed to food and feed of plant origin. Detection issues of food and feed originating from and/or containing microorganisms obtained by new mutagenesis techniques will be tackled after finalisation of the first report. The preparation of the second report will be discussed with ENGL members in the coming weeks.

Regarding your request to look into the extension of screening methods: The aspect of screening approaches will be considered in the first report, however, as it is not possible that a CRISPR/Cas footprint would remain in a final product, it would not be appropriate to propose this to the ENGL experts as a separate topic.

Moreover, we are not sure what you mean with 'multiple mutations': mutations longer than one base pair? Mutations at different locations in the genome? Mutations in the same product which have been obtained by different techniques? In dependence on the question it may open a Pandora's box for GM legislation as 'established GM production techniques' would have created also such modifications which were so far not systematically looked at during the authorisation process. Therefore, we do not see which specific new aspects would be introduced into this topic by new mutagenesis techniques.

The JRC has now initiated the drafting process of the first document with the ENGL experts, as described in my note of 26 October. The timing is very demanding and we will involve SANTE.E.3 in the process as described.

I count on your understanding of the matter. With my best regards.

Elke