Open letter
Re: Requirement to provide information on detection methods for category 1 NGTs

27 June 2025

Dear Sir / Madam,

As laboratories active in GMO analysis, we endeavour to always be at the cutting edge of science and technology. In the service of our customers, we monitor which GMOs (including NGTs) are authorised in which countries in order to be able to detect them using analytical methods.

In recent times, NGTs have become more and more of an issue for our customers and us.

We are therefore concerned that neither the EU Commission's legislative proposal nor the position adopted by the EU Parliament provides for detection methods for category 1 NGTs. Only the Council makes this demand. After all, category 1 NGTs account for around 94% of all NGTs in the development pipelines[1].

We would therefore ask you to include a new passage in the draft law that obliges developers and manufacturers of category 1 NGTs to provide detection methods, reference material and data on the genetic modification and its location as part of the authorisation procedure.

This would enable us to fulfil the requirements of our customers who want to know whether NGTs are in their value chains. This demand for transparency is shared by all our customers, not just those from the organic or Non-GMO sector.

If the legislator couldn't reach an agreement to issue a solution that is essential for large parts of the food industry, we would ask you to enable us to develop our own detection methods. This requires the obligation for developers and manufacturers of category 1 NGTs to disclose reference material and information about the genetic modification, its sequence and its location.

Regarding NGTs 2, we would like to urge you to follow the European Parliament's position: If an applicant for the authorization of an NGT2 plant has claimed that the development of a detection method is not feasible the "Union reference laboratory shall carry out its own research and analyses to confirm the claimed unfeasibility. In that case, the decision of the Union reference laboratory shall be motivated and be made public." This obligatory review should help to prevent false claims that it is not possible to provide detection methods for NGT2 plants.

Furthermore, it would be extremely helpful if EFSA would delineate the differences between conventional breeding and genome editing more precisely. At present, numerous techniques such as deletions and/or small insertions, point mutations, modification of gene expression, and in general unintended modifications fall into a grey area where their distinctions are unclear from the outset. This ambiguity further complicates the matter, as it allows for varying interpretations. Please support the commissioning of a corresponding EFSA opinion.

We will be happy to talk to you and hope to hear from you soon.

[1] Federal Agency of Nature Conservation (2024): Where does the EU-path on new genomic techniques lead us? https://www.frontiersin.org/journals/genome-editing/articles/10.3389/fgeed.2024.1377117/full

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