



Paryż, Zwijnaarde i Karlsruhe, 19 Styczeń 2024

List otwarty

do Przewodniczącej Parlamentu Europejskiego, Pani Roberty Metsoli
i Posłów do Parlamentu Europejskiego

Nowe techniki genomowe (NGT) mają kluczowe znaczenie dla bardziej zrównoważonego rolnictwa i suwerenności żywnościowej w Europie.

Na poziomie europejskim wyznaczono ambitne cele, aby zapewnić suwerenność żywnościową przy jednoczesnym zachowaniu zrównoważonego rozwoju rolnictwa, które musi radzić sobie ze zmianami klimatycznymi przy jednoczesnym zmniejszeniu zużycia środków produkcji, w tym wody, nawozów i środków ochrony roślin.

Aby osiągnąć te cele, potrzebny jest ciągły napływ innowacji. Wymaga to przyspieszenia rozwoju nowych odmian roślin, dostosowanych do opisanych powyżej ograniczeń środowiskowych. Takie nowe odmiany mogą wytrzymać stropy środowiskowe, w rodzaju suszy czy nadmiernie wysokich lub niskich temperatur (stropy abiotyczne) oraz być odporne na choroby i szkodniki (stropy biotyczne). Szybkie wprowadzenie takich odmian na rynek będzie możliwe tylko wtedy, gdy hodowcy będą mieli dostęp do wszystkich dostępnych technik bez uprzedzeń i w odpowiednich warunkach. Jednak obecnie nie ma to miejsca w Europie, ponieważ przepisy dotyczące GMO mające zastosowanie do NGT, opracowanych po 2001 r. nie są dostosowane do regulowania tych najnowszych technologii.

Wiele wyników zostało już opublikowanych, a pierwsze odmiany NGT stały się dostępne

O potencjale NGT świadczy liczba publikacji naukowych na całym świecie. Ponad 800 z nich znajduje się obecnie w bazie danych EU-SAGE¹, obejmując zakres cech opisanych powyżej i stosowanych u 70 różnych gatunków roślin. Ustawodawstwo dotyczące GMO, które zostało już przyjęte w kilku krajach na całym świecie, pozwoliło na wprowadzenie na rynek pierwszych odmian NGT, takich jak pomidor wzbogacony w kwasy gamma-aminomasłowe w Japonii, pozbawiony goryczy jarmuż w Stanach Zjednoczonych lub banan o zmniejszonym brązowieniu na Filipinach. Jeśli weźmiemy pod uwagę na przykład liczbę roślin NGT wymienionych w bazach danych USDA² lub Health Canada³, to będzie ich jeszcze więcej.

Proponowane rozporządzenie Komisji

Świadoma tej sytuacji Komisja Europejska przedstawiła w lipcu 2023 r. projekt rozporządzenia dotyczący regulacji wykorzystania odmian wyhodowanych przy użyciu NGT (kierowanej mutagenazy i cisgenazy). Projekt ten był niecierpliwie wyczekiwany przez wszystkie podmioty zaangażowane w rozwój i badania nad takimi nowymi odmianami w Europie. Przewiduje on, że rośliny wyhodowane przy użyciu NTG, które mogą również występować naturalnie lub być wytwarzane konwencjonalnymi technikami hodowlanymi, nie będą podlegać unijnemu prawodawstwu dotyczącemu GMO. Będą one podlegać przepisom stosowanym do konwencjonalnie wyhodowanych odmian. Rośliny NGT musiałyby spełniać określone kryteria zależne od sposobu modyfikacji ich genomu. Byłoby to weryfikowane przez właściwy organ, odmiany takie byłyby wymienione w publicznej bazie danych,

worki z ich nasionami byłyby oznaczone jako "rośliny NGT-1". Inne rośliny NGT nadal podlegałyby zasadom i wymaganiom prawodawstwa UE w zakresie GMO, z oceną ryzyka uwzględniającą różnorodność ich profili ryzyka i pozwalającą na sprostanie wyzwaniom związanym z ich wykrywaniem.

Potrzeba szybkiego przyjęcia proponowanego rozporządzenia

Odrzucenie stosowania NGT w odniesieniu do roślin uniemożliwiłoby Europie skuteczne uczestnictwo, wraz z innymi krajami, w podejmowaniu wyzwań stojących przed rolnictwem na całym świecie. Europa musi mieć ambicję pozostania głównym graczem w produkcji żywności we własnym interesie i w interesie naszej planety. Uważamy, że proponowane przez Komisję regulacje dotyczące roślin NGT spełniają potrzeby interesariuszy zaangażowanych w łańcuchy produkcji żywności. Przyjęcie tego wniosku, z zastrzeżeniem pewnych wyjaśnień, z których kilka zostało już uwzględnionych w projekcie poprawki Komisji ENVI Parlamentu Europejskiego, a inne mogą zostać uwzględnione w późniejszym terminie w aktach wykonawczych przewidzianych w projekcie, musi nastąpić bardzo szybko, aby umożliwić rozwój pierwszych odmian NGT przed końcem dekady, pomagając w ten sposób Europie w osiągnięciu celów, które sobie wyznaczyła.

Sygnatariusze są do Państwa dyspozycji i mogą udzielić dalszych informacji oraz odpowiedzieć na wszelkie pytania



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[1] <https://www.eu-sage.eu/genome-search>

[2] <https://www.aphis.usda.gov/aphis/ourfocus/biotechnology/regulatory-processes/confirmations/responses/cr-table>

[3] <https://www.canada.ca/en/health-canada/services/food-nutrition/genetically-modified-foods-other-novel-foods/transparency-initiative/list-non-novel-products-plant-breeding-food-use.html>

Załącznik: Lista współsygnatariuszy

Attachment to the open letter: “New genomic techniques (NGTs) are key to achieving greater sustainability of agriculture and food sovereignty in Europe”.

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