

To EU Commission

October 22, 2021

Asia and Pacific Seed Alliance (APSA) Input NGT Inception Impact Assessment

This letter is to provide feedback on behalf of the Asia-Pacific seed industry about the initiative by the European Union Commission to conduct an impact assessment as part of its intention to enact new legislation for plants produced by certain new genomic techniques.

The Asia and Pacific Seed Alliance (APSA) is a regional seed association comprised of more than 450 seed company members from both inside and outside the Asia-Pacific region. With headquarters in Singapore and Secretariat office in Bangkok, we represent members from 29 countries in the region and 23 countries outside the region, including members and partner organizations within the EU; Eighty (80%) of our total seed company members are medium and small sized companies. Fifty (50%) of total company members are integrated seed companies, whose operations include research and development facilities, seed production, seed processing, sales and marketing. APSA's mission is sustainable agriculture through the production and trade of quality seeds for the world.

According to the latest available trade figures reported through the International Trade Centre (UNCTAD/WTO) Trade Map, the annual average value of seed trade between Europe and Asia is worth about € 668 million (US\$ 777 million), broken down into €468mn (\$544mn) worth of seed exported from Europe to Asia, and about € 200mn (\$233) worth of seed imported into Europe from Asia. These figures are annual averages based on five years of data (2016 – 2020) reported for 22 categories of the most common types of sowing seed traded internationally (except paddy or seed potato). Accompanying this letter is a detailed summary of the data for your consideration.

Suffice to say that Europe is a strategic trading partner of Asia, and a key supply and distribution market for many of our members. As such, we have been following closely the developments related to policy, regulation and legislation concerning seed R&D, biotechnology, plant breeding innovation, new breeding techniques (NBTs), and, as the latest policy initiative specifically concerns, new genomic techniques (NGTs).

Firstly, APSA agrees with the findings of the European Commission's recent study concluding that applications of NBTs such as targeted mutagenesis & cisgenesis would enable the development of more plant varieties that have higher nutrient-profiles, are more climate-resilient, disease- and/or pest-resistant, rely on less natural resources and have an overall lower carbon footprint.

We concur that enabling and facilitating their adoption would support various domestic, regional and international commitments towards creating more sustainable agri-food system in the EU, and globally.

Furthermore, APSA endorses the Commission's statement that certain NGTs can be used to produce alterations of the genetic material that can also be obtained by natural mutations or conventional breeding techniques, and therefore concurs with the European Food Safety Authority (EFSA) conclusion that plants obtained by targeted mutagenesis and cisgenesis have the same risk profile as plants produced with conventional breeding, and thus should not be subject to the same regulatory oversight and processes as GMOs.

Therefore, we support the Commission's initiative to enact legislation that is consistent with this principle.

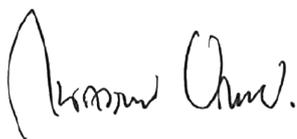
APSA's position on new plant breeding innovation, which covers both NBTs and NGTs, is aligned with that of the International Seed Federation (ISF), Euroseeds, the American Seed Trade Association (ASTA), Seed Association of the Americas (SAA) and the African Seed Trade Association (AFSTA). In principle, we believe that the underlying principle for determining the regulation of the latest plant breeding methods should be that plant varieties developed through the latest plant breeding methods should not be differentially regulated if they are similar or indistinguishable from varieties that could have been produced through earlier (conventional) plant breeding methods.

Furthermore, we believe that regulations should be formed on sound scientific principles, and that disproportionate regulations and associated costs will impede the utilization of innovative breeding methods. Therefore, policies should facilitate innovation and utilization of advanced breeding tools by public and private plant breeders both in developed and developing countries. Our full position is also amended to this letter for your reference.

In conclusion, we fully support the EU Commission's initiative to carry out an Impact Assessment, with the intention of enacting new legislation based on its recent study and conclusions from EFSA, and which would bring the EU's regulatory approach in line with those of a growing number of countries around the world.

Should you require any further input or contribution in the consultative process moving forward, please don't hesitate to let me know.

Yours sincerely,



Kanokwan Chodchoey, Ph.D.
Asia and Pacific Seed Alliance
Executive Director

Annex 1 Seed Trade between Asia and Europe

Source: International Trade Centre (ITC) of UNCTAD and WTO.
The data aggregated are mirror and direct data

Unit : US Dollar Thousand

Product code	Product label	Asia's exports to Europe					
		Value in 2016	Value in 2017	Value in 2018	Value in 2019	Value in 2020	5-yr Avg.
120926	Timothy grass seed for sowing	0	0		0		0
120924	Kentucky blue grass "Poa pratensis L." seed for sowing	2	0	0	1	4	1.4
120923	Fescue seed for sowing	27	10	1	16	7	12.2
120925	Ryegrass "Lolium multiflorum lam., Lolium perenne L." seed, for sowing	16	20	108	101	99	68.8
120921	Alfalfa seed for sowing	3139	2667	829	274	400	1461.8
120929	Seeds of forage plants for sowing (excluding of cereals and of sugar beet, alfalfa, clover ...)	754	871	1135	2526	499	1157
120910	Sugar beet seed, for sowing	1875	884	112	8	1007	777.2
120922	Clover "Trifolium spp" seed, for sowing	1458	594	247	1008	1871	1035.6
120999	Seeds, fruits and spores, for sowing (excluding leguminous vegetables and sweetcorn, coffee, ...)	16238	18556	27434	24855	22298	21876.2
120930	Seeds of herbaceous plants cultivated mainly for flowers, for sowing	20844	22401	23367	28206	27067	24377
120991	Vegetable seeds, for sowing	134031	159743	162670	156510	175183	157627.4
100510	Maize seed for sowing	28,703	10,544	11,676	12,270	17,148	16068.2
100191	Seed of wheat and meslin, for sowing (excluding durum)	13,299	5,013	4,268	2,212	304	5019.2
100111	Durum wheat seed for sowing	481	1,212	1,880	961	11	909
100210	Rye seed for sowing	53	0	0	0	0	10.6
100310	Barley seed for sowing	696	55	44	48	55	179.6
100410	Oats seed for sowing	1	0	1	0	0	0.4
100710	Grain sorghum, for sowing	0	0	0	1	1	0.4
100821	Millet seed for sowing (excluding grain sorghum)	453	380	409	295	126	332.6
120110	Soya bean seed, for sowing	396	551	893	1,476	922	847.6
120230	Groundnut seed, for sowing	143	53	9	8	5	43.6
120721	Cotton seeds for sowing	2,026	1,666	1,333	837	611	1294.6
		224,635	225,220	236,416	231,613	247,618	233100.4

Product code	Product label	Asia's imports from Europe					
		Value in 2016	Value in 2017	Value in 2018	Value in 2019	Value in 2020	5-yr Avg.
120991	Vegetable seeds, for sowing	251501	276981	304729	307207	337271	295537.8
120910	Sugar beet seed, for sowing	59817	70901	77398	62197	67584	67579.4
120930	Seeds of herbaceous plants cultivated mainly for flowers, for sowing	13312	19511	18922	21159	19808	18542.4
120929	Seeds of forage plants for sowing (excluding of cereals and of sugar beet, alfalfa, clover ...)	9512	9249	9220	11326	15118	10885
120925	Ryegrass "Lolium multiflorum lam., Lolium perenne L." seed, for sowing	8727	13512	8711	8408	12722	10416
120999	Seeds, fruits and spores, for sowing (excluding leguminous vegetables and sweetcorn, coffee, ...)	21673	23318	18066	15525	11419	18000.2
120921	Alfalfa seed for sowing	11438	11656	17794	9481	6893	11452.4
120923	Fescue seed for sowing	3237	3731	4250	5742	5111	4414.2
120924	Kentucky blue grass "Poa pratensis L." seed for sowing	2006	3002	3635	2608	1479	2546
120922	Clover "Trifolium spp" seed, for sowing	2038	2895	1112	1949	1438	1886.4
120926	Timothy grass seed for sowing	0	0		0		0
100510	Maize seed for sowing	34,038	32,245	41,103	48,472	55,287	42229
100191	Seed of wheat and meslin, for sowing (excluding durum)	21,104	7,514	32,678	23,661	42,460	25483.4
100111	Durum wheat seed for sowing	11,106	12,537	6,684	9,940	23,930	12839.4
100210	Rye seed for sowing	10	30	52	155	95	68.4
100310	Barley seed for sowing	2,434	1,542	28,111	32,627	19,249	16792.6
100410	Oats seed for sowing	315	285	142	397	212	270.2
100710	Grain sorghum, for sowing	184	459	588	1,390	1,363	796.8
100821	Millet seed for sowing (excluding grain sorghum)	686	894	685	1,125	1,277	933.4
120110	Soya bean seed, for sowing	1,460	3,088	3,876	3,766	3,584	3154.8
120230	Groundnut seed, for sowing	22	28	43	16	0	21.8
120721	Cotton seeds for sowing	218	369	416	630	1,228	572.2
		454838	493747	578215	567781	627528	544421.8