

NGT PROPOSAL

Statement by Environment Agency Austria

Main criticism

Annex I criteria

Scientific justification?

Complete deregulation of NGT 1 plants

Uncertainty regarding risks

Labelling/Traceability missing

Prohibited in organic and GM-free production → unforeseeable burden (destruction of market?)

Delegated Acts

Power given to Commission to define process (e.g. data to be provided by applicant) and define risk assessment requirements for NGT2, and more...

Patents, Opt out, Cartagena Protocol, ...

Annex I

Concept is wrong

- **To base deregulation on simple technical criteria, i.e. number of changes, has no scientific justification**
- **20 is arbitrary number, never really substantiated**
- **20 only for insertions, deletions unlimited**
- **It is not the number but the nature of the changes which is important.**
- **It's not the technology used but the result which is important.**
- **Risk is not defined by technology but by the product and its use (plant/trait/environment)**

20 changes is only the beginning

- **NGT1 Plants, once on the market, are to be treated like conventionally bred plants**
- **Further breeding steps, including crossing of two or more NGT 1 plants, not controlled.**
- **This can lead to much higher number of changes: NGT1 (20 changes) x NGT1 (20 changes) = NGT1 (40 changes)**
→ still equivalent?
- **Argument, that NGT1 is limited to 20 changes, does not hold true.**

In conclusion

- **The proposal in its current form is not based on scientific evidence.**
- **Basic concept is wrong and should have been discussed at the start.**
- **Scientific studies show that the stated “equivalence” is questionable.**
- **Precautionary principle is ignored.**

We need to go back to the start and discuss an adaptation of the current legislation on a scientific basis, taking recent findings and developments (e.g. AI, use in wild plants) into account.

KONTAK

Treas Heissenberger
Head of Expert Team
Landuse & Biosafety

andreas.heissenberger@umweltbundesamt.at

[umweltbundesamt.at](https://www.umweltbundesamt.at)



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