CropLife International Position on Information Sharing & Transparency in Plant Breeding

March 2023

Key points

- ***CropLife International (CLI) supports making plant breeding information available on an individual member basis for their introduced seed varieties***
- ***CLI believes that any requisite traceability to facilitate consumer choice be accomplished through agreements between breeders, suppliers and consumers***
- ***CLI supports voluntary food labeling systems which can highlight food characteristics or production methods that are of interest to consumers and farmers***
- ***CLI members are committed to the responsible management of plant science products and utilizing best practices in their stewardship with plant breeding innovations, both at pre- and post-commercial stages.***

Overview

CropLife International (CLI) member companies, and the seed industry more broadly, have a long history of developing healthy, productive, and safe plant and seed varieties. As the technologies used in the development of these varieties continues to evolve and grow, so does the policy and regulatory environment that governs their use. Ensuring that the latest varieties can continue to reach farmers and deliver benefits to society whilst enabling trade and effective value chain interactions, requires dialogue and information sharing between the seed sector, government, grain trade, and other value chain members including food processors, retailers, and consumer groups. Further to this goal, CLI believes that the value chain dialogue should include information sharing on

(a) how certain breeding methods that may trigger premarket regulatory status evaluations (e.g. genome editing) are being used to develop new plant varieties,
(b) which crops and varieties these breeding methods have been/are being used to improve,
(c) changes and evolution in international policy and regulatory approaches and
(d) any specific trade focused discussions

We recognize that the structure of this dialogue (participants, frequency, timing) is driven by the specific needs and context at the national level. At the "seed sector" industry level we have agreed on basic principles to support trust building based on transparency and proactive information sharing that draws on experience across the seed sector and with a range of breeding technologies including transgenics. Beyond a commitment to value chain dialogue, there are additional more specific elements outlined below.

A. Product Registries and Databases

CLI and its members believe that plant varieties developed through the latest plant breeding methods, like genome editing, should not be differentially regulated if they are similar or indistinguishable from varieties that could have been produced through earlier plant breeding methods. Despite this strong belief, it is also appreciated that in numerous countries the current policy requires a proactive determination by governments that such products will not be differentially regulated compared to conventionally derived products. Thus, there is a desire by various stakeholders for information regarding plant varieties/products/product lines coming to the market that have been improved using the latest plant breeding methods (either to inform choice or answer market requests) and, as such, numerous national, multilateral, or non-governmental schemes have been developed to provide such information. These various approaches are a mix of national level policies to make regulatory consultation decisions public (e.g. Brazil, US, Japan, Canada), international proposals for governments to compile and share this information amongst themselves (e.g. OECD), and non-governmental, value-chain led initiatives.

CLI supports making plant breeding information available on an individual member basis for their introduced seed varieties;

CLI, however, cautions against the proliferation of multiple third-party databases given their likelihood to be quickly outdated, not reflective of products likely to ultimately enter commerce, or not capturing the product offerings being delivered by a broader array of developers than have historically introduced transgenic plant products.

B. Traceability & Detection

CLI recognizes there has been much interest in detection and traceability of genome edited products. From a technical feasibility standpoint, it is possible to detect DNA sequence changes resulting from genome editing applications in plants with currently available technology. However, without accompanying additional information about the specific sequence change and its location in the genome, it is not possible to *uniquely identify* a genome edited product as the DNA change could have arisen by various means (e.g. using genome editing tools, conventional breeding tools, or as a result of spontaneous genetic variation from generation to generation.)

CLI believes that any requisite traceability to facilitate consumer choice be accomplished through agreements between breeders, suppliers, and consumers;

This is analogous to the approach taken in other differentiated products for which there is no reliable detection methods (e.g. shade grown coffee, cage-free eggs). As digital capabilities evolve, CLI members will continue to explore further tools that support transparency and build trust from all stakeholders.

C. Labeling

CLI members are committed to sharing information around seed products to allow farmers to make informed choices. CLI members are also committed to continued dialogue across the food and feed value chain to help explore options that promote informed choices by consumers. To this point**,** CLI believes that mandatory labeling of food products at point of sale should be used to communicate information that is relevant to health, safety, and nutrition. More specifically, CLI supports food labeling where there is a material change in nutritional composition or change in toxicity or allergenic potential; however, such labeling standards should be based on the nutritional and/or safety characteristics of the food product and not the method of production. This ensures labeling is measurable, objective, science based, verifiable and enforceable.

CLI supports voluntary food labeling systems which can highlight food characteristics or production methods that are of interest to consumers and farmers and can aid their purchasing choices in the marketplace — as long as the information is truthful and not misleading. While voluntary labeling or disclosure systems could be implemented based on plant breeding methods, any labeling or disclosure approach needs to continue to be truthful and not misleading which may require trackable value chain or reliable methods to validate use of plant breeding tool claims or statements. Technology 'absence claims', such as labels which identify that a particular breeding technology was NOT used, can be misleading and should be subject to regulatory guidelines.

D. Stewardship

CLI and its members are committed to the responsible stewardship of all plant science products, including varieties developed with plant breeding innovations. This is inclusive of existing quality management practice systems employed by plant breeding organizations to ensure the delivery of safe and effective plant varieties as well as more specific requirements that may be in place for plant varieties that have pre-market requirements in certain jurisdictions.

CLI members are committed to the responsible management of plant science products and utilizing best practices in their stewardship with plant breeding innovations, both at pre- and post-commercial stages and have been working – along with leading plant breeding organizations - to develop 3rd party verification programs like the Plant Breeding Innovation Management Program under the Global Stewardship Group.