## **OPPOTUNITY**

## Position of Agreement Oppotunity,

the leading players of the European Potato Starch value chain, towards the proposal for a

"REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on plants obtained by certain new genomic techniques and their food and feed, and amending Regulation (EU) 2017/625" COM(2023)411

by the European Commission

We share the objectives and the reasons for the proposal for Regulation 2017/625 and welcome the constructive and pragmatic approach to differentiate between "similar to traditional breeding" (targeted mutagenesis and cisgenesis) on one hand and all other New Genomic Techniques on the other hand. Via this approach it seems possible to support the achievement of the targets of the EU Farm to Fork strategy whilst assuring safety for man, animal and environment.

For the potato starch value chain which predominantly consists of farmer cooperatives and sme's the chosen approach allows to improve the sustainable cultivation of starch potatoes via for example increased resistance against diseases like late blight, currently mainly controlled by crop protection products. Also, it would allow for improvements of potatoes which would become easier to process and as such would need less energy and other inputs in production to obtain potato starch that is well suited for various industrial applications.

The proposed regulation foresees simple though complete notification and information to competent authorities who are obliged to provide in a timely manner a registration/authorization prior to bringing the NGT seed to the market. We fully agree with the proposed transparency for the varieties were NGT has been used as well as a publicly accessible database, full transparency is assured in this manner without labelling of the potatoes grown and the products produced therefrom. It is with relief that we read that the cost for authorisation will be kept lowest for the applicants and even lower for sustainable traits, in this way the NGT(1) technology can be used in a economic viable manner for the breeders of small crops like the starch potatoes are.

As many members of the starch potato value chain are regionally concentrated within many countries in Europe it is key for this value chain to have the possibility to develop for a specific regional climate and soil profile tailored starch potato varieties with traits that can become available with the proposal on the table.

We welcome a clear differentiation with the current "organic" EU-legislation.

For the starch potato value chain, the ability to obtain new varieties with improved traits is decisive to fulfill the requirements that will be implemented under the Green Deal.

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## **About Opportunity:**

Oppotunity is an Agreement between 12 parties predominantly active in potato starch and starch potatoes. We cover ~65% of the production of this Europe only industry. In competition with corn, tapioca and wheatstarch especially corn benefits since many years from a significant breeding progress due to massive investments in breeding by the industry, making corn starch more competitive.

Around 11.000 farmers grow on ~235.000 ha starch potatoes and obtain a substantial part of their income from this crop, with all measures related to new crop protection legislation and the need to grow potatoes more sustainable the competitiveness and thus the future of starch potato cultivation and production is threatened as well as the direct jobs of ~3.500 persons working in this industry.

Opportunity will develop, beside being active to get the proposed EU regulation on NGT's soonest implemented, a new starch potato variety that has an increased resistance against late blight to be able to start soonest with the cultivation on a NGT1 starch potato once the regulation is in place and start the contribution towards a more sustainable potato starch value chain and assure the economic independence of many families in rural agricultural areas in Europe as well as the strategic independence and security of supply .

For question please contact: info@oppotunity.eu

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