



Commissioner Stella Kyriakides
European Commission
Rue de la Loi 200
1049 Brussels
Belgium

By email

May 11, 2020

Dear Commissioner Kyriakides,

I am writing to you on behalf of MAIZALL, the International Association of Maize Growers of Argentina, Brazil and the United States. Together, MAIZALL's farmers grow 50 % of all maize in the world and 70% of the world's exportable surplus.

First of all, we would like to thank the Commission for MAIZALL's meeting with staff of DG SANTE in Brussels in October 2019, which highlighted the importance of exchanging information and approaches on topics of common interest such as, biotechnology, pesticides and sustainable farming practices.

We would also like to share our concerns about the global effects of the COVID-19 pandemic, given its unpredictable and undesirable consequences on human health and the world economy. In this respect, we wish to express our solidarity, especially with those European Union countries that have been most affected.

Political and economic leaders have expressed their concerns about the consequences of the virus on public health, social and economic policies, but there is also discussion on the outlook for world trade today and at the end of this crisis. That is why we would like to share with you our concerns and suggestions with a view to working more closely together in the future.

The European Green Deal proposes a new growth strategy which aims to transform the EU into a more fair and prosperous society, with a modern, resource-efficient and competitive economy in which greenhouse gas emissions will be reduced significantly, resulting in a climate-neutral economy by 2050.

From our point of view, we can contribute to these objectives through research and investment in new technologies for food production. Our countries have successfully



used these technologies, which have been evaluated and approved through rigorous regulatory systems that ensure food safety and environmental preservation. The results show an increase in production, improvement in competitiveness and environmental benefits such as reductions in the use of pesticides, fuel and other inputs as well as improvements in soil quality and biodiversity.

MAIZALL therefore suggests that the European Commission takes this opportunity to improve EU policies that present obstacles to imports of maize and its by-products from our countries.

The COVID-19 crisis has once again demonstrated the critical role of agriculture and efficient international agri-food supply chains. We believe that all countries and regions have a responsibility to ensure the smooth functioning of a trading system in which healthy and safe agricultural products can move freely from regions of surplus to areas of demand.

We would like to restate some of the topics that we discussed in our meeting with SANTE in October 2019.

Harmonization of regulatory systems that evaluate and approve GMOs

As we discussed during our October meeting, our GM crops are evaluated by leading independent scientists to ensure that all approvals guarantee environmental and food safety. Our government approval procedures systems have evolved and now take much less time to approve new crops, allowing new technologies to reach farmers more quickly, especially for the cultivation of maize. However, some export destinations, such as the EU, take much more time to approve new biotech crops, which leads to asynchronous approvals and trade obstacles, or delayed commercialization.

The average evaluation and approval times in the MAIZALL countries are significantly less than those of the EU. We believe that if the deadlines established in EU's own legislation for the different stages of the GMO evaluation and approval process were to be implemented today, the risk of asynchronous approvals and potential commercial disruptions would be considerably reduced.

In this respect, we would like to highlight a recent commitment of the People's Republic of China to reduce approval times to two years on average.



Plant Breeding Innovation

Innovation applied to genetic improvement is necessary to meet the challenges of global changes, such as population growth and climate change. Agriculture has been able to meet these challenges in the past. However, more efforts are needed, and therefore breeders are looking for new plant breeding techniques. These techniques can generate important benefits both in pest control and in improving the production and quality of food.

Recently, several countries have made progress in evaluation systems through mechanisms of prior consultation with breeders, although much remains to be done. It is important that all evaluation systems move forward in a harmonious manner in order to avoid future asynchronies. It is noteworthy that these plant breeding innovations are being applied by a large number of universities and public research institutes since one of the key elements of these techniques is that they are much cheaper to develop.

On this point, there is general concern among many scientists, plant breeders and industry stakeholders about the definitions and legal interpretations that have been adopted in the EU regarding the classification of products obtained from the application of these techniques and the friction and complications that these issues could bring to international trade.

In this respect, we consider that the exchange of information between countries, with a view to updating and harmonizing regulatory approaches for these techniques, based on the latest scientific evidence, would facilitate their adoption at a global level and minimize potential commercial disruptions.

Maximum Residue Levels

MAIZALL is concerned about lower maximum residue levels (MRLs) for an increasing number of plant protection products in the EU. For substances whose authorizations are not renewed because they trigger the EU hazard-based cut-off criteria, we understand that the MRLs would be reduced to their detection level, practically zero (0.01 mg / kg). While we understand that registrants can submit applications for import tolerances in this situation, in our view automatically deleting well-established MRLs (in particular those based on Codex MRLs) would have disproportionate consequences for trade compared to any reduction of the risk for consumers, and would not respect the requirement for the use of risk assessments under the WTO SPS Agreement.



In addition, with respect to the process for assessing applications for import tolerances, more certainty and clarity are needed regarding the criteria that the EU will apply in its case-by-case approach and the time it would take to complete the procedure.

In our view, an open global trading system based on predictable, transparent and science-based food safety regulations is essential to meeting the demands of global food security and sustainability. Farmers everywhere must be able to access and choose the full range of tools and technologies available for agricultural production. With regards to the “Farm to Fork” strategy that the EU plans to launch, we have extensive data showing the operational, economic, environmental and social benefits of the technologies we implement and we would be pleased to share them with you and your team.

To conclude, I would like to again express the hope that solutions to end or control this pandemic will be found soon.

I want to thank you for your time and consideration of our concerns.

I look forward to hearing from you.

Sincerely,

Juan Minvielle

President of MAIZALL

Cc: Commissioner Timmermans
Commissioner Hogan
Commissioner Wojciechowski