

## EuropaBio comments on the designation of official laboratories for animal and plant health and safe food and feedstuffs

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EuropaBio appreciates the opportunity to comment on the delegated regulation.

It is important for us to highlight the importance and responsibility of the European Union reference laboratories in sampling and analysis for the official control of feed/food as regards presence of genetically modified material.

According to recital 72 of Regulation (EU) 2017/625, the European Union reference laboratory for genetically modified food and feed and the European Union reference laboratory for feed additives are responsible to fulfill the purposes of Regulation (EC) No 1829/2003 and of Regulation (EC) No 1831/2003.

Moreover, in Article 93, point 5 of Regulation (EU) 2017/625 is written:

*"By way of derogation from paragraphs 1 and 2 of this Article, the laboratories referred to in the first paragraph of Article 32 of Regulation (EC) No 1829/2003 and the first paragraph of the Article 21 of Regulation (EC) No 1831/2003 shall be the European Union reference laboratories having the responsibilities and performing the tasks referred to in Article 94 of this Regulation in the areas respectively of:*

*(a) GMOs and genetically modified food and feed; and*

*(b) feed additives."*

Our understanding is that the PCR analysis on recombinant DNA in conjunction with Regulations (EC) No 1829/2003 and 1831/2003 is the responsibility and the task of the European Union reference laboratories and that the transfer to other laboratories should not be allowed and not covered by this delegated regulation.

