



Cibus Europe B.V.  
Goessestraatweg 19  
4421 AD Kapelle, The Netherlands

Directorate-General Health & Consumers Dir E.1  
European Commission  
B-1049 Brussels  
Belgium

27th January 2015

Dear

In Europe, Cibus' Rapid Trait Development System (**RTDS**) is considered a type of Oligo-Directed Mutagenesis (ODM). In November 2010 we had the opportunity to introduce **RTDS** to your Unit and we informed you of our 2011 progress in a letter. We would now like to provide you with a brief update on further advancement in using this technology for product development.

In 2004 the US Authorities indicated that **RTDS** products could be handled as any other product of mutagenesis. While pre-commercial activities started in the USA in 2011, the commercial launch of the first products has recently been announced. In Canada we successfully concluded the Plant with Novel Traits evaluation of the first **RTDS** products in 2013 and the 2014 season marked the first unconfined introductions. The harvested material is used like any other crop and likely entering the international commodity chain. As we discussed already in 2010, it can therefore not be excluded that commodities with **RTDS** products are imported in the EU.

Based on the excellent results, we expect rapid market expansion in North America. Furthermore, responding to a strong interest of European breeders, we continue to explore performing field trials in more EU Member States. We share in your frustration that the interpretation of the GMO definition that started in 2007 has not yet reached a conclusion. We would like to renew our support to advance this evaluation that will create legal certainty and enable European agriculture to embrace state-of-the-art breeding techniques.



Cibus Europe B.V.  
Goessestraatweg 19  
4421 AD Kapelle, The Netherlands

Should you require any additional information, please feel free to contact us. Of course, we will keep you informed on further developments of **RTDS** in crops and would appreciate if you and your services could foresee an opportunity to discuss this during the Spring of this year.

Yours sincerely,

Cibus Europe B.V.

Email: \_\_\_\_\_@[cibuseurope.com](mailto:cibuseurope.com)

cc.

\_\_\_\_\_, US Mission to the EU

\_\_\_\_\_, Canadian Mission to the EU