



National Institute for Public Health  
and the Environment  
*Ministry of Health, Welfare and Sport*

# Risk assessment when no comparator is available

EFSA stakeholder workshop on  
comparators

Boet Glandorf  
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the Environment  
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## ERA when no comparator is available

*'For ERA, the main focus should be on the environmental impacts and the management of the GM plant compared to what is currently grown. Thus, when an appropriate comparator(s) as defined in this document is not available, **the comparator should be a non-GM line that is as close as possible to the characteristics of the GM plant except for the intended modification** (e.g. for a GM modified potato with little or no amylose a conventional variety with a high amylopectin content could be used as a comparator).'*



## Question 1

- GM plants can be modified in its own pathways, for example to increase plant growth or plant yield, or to change characteristics. Examples are GM plants with modified levels of plant hormones, or modified in transcription factors.

What to use as a comparator for ERA in these cases?



## Question 2

- There is no reference in the guidance to GM plants with new traits like tolerance to abiotic conditions (like drought or salt tolerance). For these GM plants new cultivation areas will arise, in which the non-GM counterpart will not be able to be cultivated.

What to use as a comparator for ERA in these cases?