
Comments from The Norwegian Scientific Committee for Food and Environment (VKM) to the European Food Safety Authority (EFSA):

«Applicability of the EFSA opinion on site-directed nucleases type 3 for the safety assessment of plants developed using site-directed nucleases type 1 and 2 and oligonucleotide-directed mutagenesis»

- Comment: In line 415 it is stated: “these plants will not present any of the potential hazards related to the insertion of a transgene”. To us, it is not completely clear whether this relates to hazards caused by insertion process itself, or to hazards caused by the inserted sequence. Please clarify.
- Comment: The value of this opinion for risk assessors would have been improved if the opinion discussed more thoroughly point-by-point which data requirements outlined in the *Guidance for risk assessment of food and feed from genetically modified plants (EFSA, 2011)* and the *Guidance on the environmental risk assessment of genetically modified plants (EFSA, 2010)* are relevant or not relevant for plants developed using the SDN-1, SDN-2 and ODM techniques.