

**Written evidence to the House of Commons
Environment, Food and Rural Affairs
Select Committee**



Brexit: Trade in food inquiry

20 October 2017

1. Introduction and summary

- 1.1. GM Freeze is the UK's umbrella campaign on genetic modification (GM) in food and farming. We are working to help create a world in which everyone's food is produced responsibly, fairly and sustainably. Our members include NGOs, charities, farmers, retailers, scientists, grassroots campaigners and concerned individuals.
- 1.2. UK consumers consistently demonstrate their rejection of GM food in polls and in their buying behaviour.
- 1.3. Labelling of GM products offers consumers the opportunity to make informed choices and avoid GM products should they wish to do so. Along with other GM regulations, the labelling of GM foods is a point of significant divergence between the European Union (EU) and other potential key trading partners, particularly the United States (US).
- 1.4. UK producers and manufacturers will need to comply with EU food regulations to continue to trade in key EU markets. They will be at a competitive disadvantage at home if GM products imported from non-EU territories can be sold in the UK without declaring their GM status on the label.
- 1.5. There is significant political divergence over GM crops within the UK. All three devolved nations have taken up all available opportunities within EU legislation to prohibit the cultivation of GM crops.

2. Consumer rejection of Genetically Modified (GM) food

- 2.1. The UK public rejected GM food outright when it first appeared in the shops.
- 2.2. Far from going away, public concern about GM food has actually risen over the seven years of the [Food Standards Agency \(FSA\)'s Biannual Public Attitudes Tracker](#) (ie since 2010). When consumers are asked in this regular poll "what food issues, if any, are you concerned about?" GM foods are consistently mentioned more often, both spontaneously and in response to a long list of possible concerns, than food hygiene at home and the use of hormones, steroids or antibiotics in food.
- 2.3. A poll by Bright Blue in April 2017 found that [63% Conservative voters support a ban on GM crops.](#)

3. GM labelling and consumer choice

- 3.1. [EU Directive 2001/18/EC](#) controls the deliberate release into the environment of genetically modified organisms (GMOs). Critically for consumers, the directive - and the regulations that put it into practice - also require the labelling of products containing GMOs. [A GfK NOP poll commissioned by Friends of the Earth and GM Freeze in June 2010](#) found that 89% of people want GM products to be clearly labelled and 72% were willing to pay extra for non-GM food.
- 3.2. Widespread consumer rejection of GM food is borne out at the till. Despite some [92 GM "events" being approved for use in food sold for human consumption across the EU](#), GM foods are a rare sight on our supermarket shelves because consumers simply won't buy products that they know to contain GM ingredients. In contrast, GM animal feed (for which an almost identical list of GM traits is approved in the EU) has [quietly become the norm](#). Most consumers are unaware of the presence of GM crops in the UK food chain because their use does not have to be mentioned on the label of the meat, eggs, dairy products and farmed fish they help to produce.
- 3.3. The UK situation currently contrasts sharply with the United States (US) where [twice as many GM "events" are approved for use in food](#) and GM ingredients do not have to be declared on the label. The use of GM soya, maize (particularly via high fructose corn syrup) and oil seed rape (known as canola in the US) is almost universal in non-organic processed foods sold in the US.

4. GM regulation and trade

- 4.1. The importance of trade with the EU is likely to mean that most foods produced in the UK after Brexit will continue to adhere to EU regulations on ingredients and labelling requirements. However, if EU approval processes and labelling requirements are not transferred into UK law, the same will not be true for food and drink imported from the US, Canada and other territories.

4.2. If the UK relaxes GM labelling or ingredient approval regulations, UK food producers and manufacturers, who will still need to meet the higher standards of our closest trading partners in the EU, will be put at a competitive disadvantage when trying to sell their products at home. At the same time, UK consumers will no longer be able to make informed choices about what they are buying and eating.

5. Scotland, Wales and Northern Ireland

5.1. In 2015, Directive (EU) 2015/412 came into effect, amending Directive 2001/18/EC to allow EU member states and regions with competent authority status to restrict or prohibit the cultivation of GMOs in their territory. [All three of the UK's devolved nations took up the offer as soon as it was made available](#). Scotland, Wales and Northern Ireland signed up to ban the one GM crop currently permitted to be grown in the EU and the seven other crops that were then in the authorisation pipeline.

5.2. [As Scotland's then Rural Affairs Secretary, Richard Lohead said at the time](#) "[A]llowing GM crops to be grown in Scotland would damage our clean and green brand. The Scottish Government has long-standing concerns about GM crops - concerns that are shared by other European countries and consumers, and which should not be dismissed lightly. I firmly believe that GM policy in Scotland should be guided by what's best for our economy and our own agricultural sector rather than the priorities of others."

6. Conclusion

To protect consumers' right to make informed choices, and to ensure that the need to trade with the EU does not put our UK producers and manufacturers at a competitive disadvantage at home, there must be no changes to the operation of Directive 2001/18/EC, Regulation (EC) No 1829/2003, Regulation (EC) 1830/2003 or Directive (EU) 2015/412 in the UK without full and proper parliamentary scrutiny, including in all devolved administrations.

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