

Written evidence to the Department for Environment, Food and Rural Affairs

Health and Harmony: the future for food, farming and the environment in a Green Brexit



8 May 2018

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. Many GM Freeze member organisations have informed us that they are also submitting evidence to this consultation. Our evidence reflects our role as their specialist agency on issues relating to genetic engineering in food and farming but does not seek to cover the full range of our members' views in other areas.
- 1.3. Our response is not confidential and will be published on the GM Freeze website, www.gmfreeze.org
- 1.4. We are concerned by the consultation's request that respondents rank preferences on key issues. GM Freeze considers that this is an unhelpfully simplified approach and we have received significant correspondence from concerned members of the public, indicating that they have found it difficult to access this key consultation through the online portal due to the prominence of such questions.
- 1.5. In summary, other key points in our submission include:
 - Genetic resources and genetic diversity are both key public goods. Genetic resources should not be controlled through patenting.
 - The assessment of public goods must take a holistic approach to support system change.
 - Consumer choice is a public good and must be protected through comprehensive GM labelling at all stages of the food chain.
 - The UK needs a robust and transparent process for authorising the use of GMOs; effective measures to prevent GM contamination and an effective liability regime for those affected by GM contamination.
 - The devolved nations' divergent policy on GM in food and farming must be respected and legislation developed that will allow it to be fully implemented.

Contact address: 80 Cyprus Street, Stretford, Manchester M32 8BE

Tel: 0845 217 8992 **Email:** liz@gmfreeze.org **Web:** www.gmfreeze.org **Twitter:** @GMFreeze

Registered office: 50 South Yorkshire Buildings, Silkstone Common, Barnsley S75 4RJ

2. Agricultural technology and research – priority research topics

- 2.1. We have serious concerns about the format of the consultation question under this heading, which asks respondents to rank the importance of six different research topics relative to each other. Publicly funded research should begin from a holistic perspective, considering the intersection between different research topics and the impact of potential new developments on the whole system. This should include ongoing research into unexpected impacts of new technologies.
- 2.2. Also, a simple ranking exercise will not help the Department to understand respondents' views on key issues. For example, without seeking further information from each respondent it will not be possible to understand whether their ranking of option "a) Plant and animal breeding and genetics", reflects a particular view on the use of genetic engineering.

3. Agricultural technology and research – putting farmers in the driving seat

- 3.1. The patenting of seed has long been a widespread concern, both amongst and beyond groups that actively express concern about GM on other grounds.
- 3.2. Genetic resources are a public good (see 6.2 below) and should not be controlled by any individual, group or organisation. Farmers will never be in the driving seat of agricultural research and development while the seed on which they rely is owned and controlled through patenting and restrictive contracts.

4. Public money for public goods – environmental outcomes

- 4.1. Similar to point 2.1, above, GM Freeze is concerned by the request to rank public goods relative to one another. Public subsidy should be used to support and encourage systemic change that contributes to a range of interconnected public goods.
- 4.2. Consideration of specific outcomes must also be assessed from a more holistic perspective. For example, a reduction in the quantity of pesticides sprayed is not a public good if it is achieved through the use of more toxic pesticides, or the production of toxic substances within the crop plant itself (for example as with genetically modified Bt crops), as both of these options will still result in harm to non-target species.

5. Public money for public goods – animal and plant health

Genetic diversity should be recognised as a public good, in addition to biodiversity. In the consultation introduction, the Secretary of State recognises that "productive and resilient forestry, horticulture and agriculture industries depend on good tree, plant and animal health". Resilience to disease, pest attack, short and long-term climate fluctuations can be significantly improved through the use of a more genetically diverse stock of seed, plants and animals.

6. Public money for public goods – other outcomes

- 6.1. Public health is a clear and vitally important public good that is missing from the command paper. Farmers should be rewarded for providing a diverse range of food that is healthy, nutritious and sustainable. This should not include supporting the genetic modification of crops to produce commercially valuable micronutrients but should instead support measures that will encourage consumers to move to a more diverse and balanced diet that will meet all nutritional requirements without the need for supplementation.
- 6.2. Genetic resources are a public good and should not be controlled by any individual, group or company. Subsidies should not support private ownership of public goods such as genetic resources.
- 6.3. Consumer choice is a public good that can only be realised through effective food labelling. [A GfK NOP poll](#) found that 89% of people in the UK want GM products to be clearly labelled and 72% were willing to pay extra for non-GM food. It is vital that the requirement to label genetically modified foods is retained when the UK leaves the European Union, including on imported foods.

7. Changing regulatory culture

- 7.1. The UK must establish and operate a robust and transparent process for authorising the use of genetically modified organisms (including those produced through newer genetic engineering techniques such as genome editing) after the UK leaves the European Union.
- 7.2. In the consultation introduction, the Secretary of State commits to “move towards a more effective application of the ‘polluter pays’ principle.” GM Freeze welcomes such a move on the condition that it includes establishing and enforcing an effective liability regime that will ensure fair compensation for UK farmers, growers, beekeepers and any other business impacted in the event of contamination with GM material, pesticides or other contaminants.
- 7.3. The damage caused by GM contamination can extend far beyond immediate financial loss, so it is also vital to put in place effective measures to prevent contamination happening in the first place. This includes active measures to prevent contamination of conventional and organic seed, crops, feed and food from GM material and the pesticides associated with the use of herbicide tolerant GM crops.

8. Ensuring fairness in the supply chain

- 8.1. We welcome the Secretary of State’s commitment (in the introductory section of the consultation document) to “maintaining high standards of consumer, worker and environmental protection in trade agreements.”
- 8.2. As noted under 6.3, above, consumers place a high value on the opportunity to make an informed choice about what they are eating, including the presence of genetically modified ingredients and the use of GM animal feed. GM labelling supports this and creates a level playing field for UK-produced and imported food products.

8.3. UK producers and manufacturers will need to comply with EU food regulations to continue to trade in key EU markets. In reality this means they are significantly less likely to use GM ingredients than their competitors from outside the EU. They will, therefore, 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.

8.4. As noted under 7, above, it is vital that no GMOs (including those produced with newer genetic engineering techniques such as genome editing) are cultivated in the UK until effective measures are put in place to prevent contamination at any stage in the supply chain. This includes establishing and maintaining an effective “polluter pays” liability regime.

9. Devolution: maintaining cohesion and flexibility

9.1. The introduction to the Health and Harmony consultation paper states that “It is the government’s expectation that the process will lead to an increase in decision-making powers for each of the devolved administrations”. GM is key area of divergence, yet was included in the [list of 24 areas released in March where a “legislative common approach might be needed”](#).

9.2. GM Freeze recognises the potential difficulties that would arise from divergent legislation on the cultivation of GM crops. However, solutions to resolve these difficulties must recognise and respect the views of the devolved nations. Scotland, Wales and Northern Ireland all took full and immediate advantage of the opportunity to prohibit the cultivation of GMOs in their own territory, under Directive (EU) 2015/412. Their right to farm GM-free must be respected and upheld after the UK leaves the European Union.

9.3. As noted under 7 and 8.4, above, it is vital that no GMOs (including those produced with newer genetic engineering techniques such as genome editing) are cultivated in any part of the UK until effective measures are put in place to prevent contamination at any stage in the supply chain, including across borders. This includes establishing and maintaining an effective and enforced “polluter pays” liability regime.

10. International trade – protecting our brand

We welcome the Secretary of State’s commitment, in the introduction to the consultation document, to “supplying products of the highest standards to the domestic market and increasing exports”. For consumers across the UK and beyond, high standards means GM free and the ability to make an informed choice through compulsory labelling of the use of all forms of genetic engineering across the supply chain.

11. Proposed powers and measures in the Agriculture Bill

- 11.1. The Agriculture Bill is a huge opportunity for positive change, but it cannot achieve a more responsible, fair or sustainable agriculture system without incorporating and endorsing key principles. These include, but are not limited to, the precautionary principle, the principle that preventive action should be taken, that environmental damage be rectified at source and that the polluter should pay.
- 11.2. Similarly, the bill must maintain key safeguards including a GM approvals process that prevents the release of genetically engineered material into the environment without a rigorous and independent, case by case risk assessment.
- 11.3. The bill should recognise the validity of social, economic and ethical impacts of different ways of growing and producing our food. It should support and enable the consideration of such issues in all relevant approvals processes and the allocation of both political support and public subsidy.
- 11.4. The bill must protect farmers, growers, beekeepers, food producers and retailers by establishing and maintaining robust measures to prevent contamination of non-GM crops, honey, food and feed with GM material of any kind. This includes operating an effective 'polluter pays' liability regime that will ensure fair compensation for UK farmers, growers, beekeepers and any other business impacted in the event of contamination with GM material of any kind. This includes all forms of genetic engineering, such as genome editing
- 11.5. The bill, or related legislation, must protect consumers' right to make an informed choice through a UK-wide requirement to label food containing GM ingredients and food derived from animals that have been fed GM crops, including those created using newer genetic engineering techniques such as genome editing.

Liz O'Neill
Director, GM Freeze