

Response ID ANON-JD6S-EHAP-N

Submitted to **Consultation on the UK potentially seeking accession to the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP)**

Submitted on 2018-10-24 17:42:43

Privacy and confidentiality

Do you consent for the voluntary information you provide in this consultation to be used as part of the Government's published consultation response?

Yes

If you answered no to this question, please give your reason.:

Do you consent for the Department for International Trade, or organisations working on their behalf, to contact you regarding the responses you have given?

Yes

Who are you responding as?

What is your name (first name and surname)?

Name:

Liz O'Neill

What is your email address?

Email:

liz@gmfreeze.org

Please tell us who you are responding as?

Non-governmental organisation – In an official capacity as the representative of a non-governmental organisation / trade union / academic institution / other organisation.

Non-Governmental Organisations (NGOs) - about you

What is the name of the organisation (e.g. trade union, interest group, charity or academic institution) you are responding on behalf of?

Organisation:

GM Freeze

Which area does your organisation represent?

Food, Environment, Farmers, Consumers, Product Regulation / Safety, Science / Technology

If you selected other, please tell us which area your organisation represents in the box below:

How many members does your organisation represent in total?

10 – 100

Does your organisation have a presence in, or operate in, one or more of the existing Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) member countries (Japan, Vietnam, Singapore, Malaysia, Brunei, Australia, New Zealand, Canada, Mexico, Chile and Peru)?

No

NGOs - Questions about the UK's future trade relationship with the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP)

Have any of your members been in contact with your organisation about the UK joining the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP)?

Yes

NGOs - The UK's future trade relationship with the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) - benefits

What does your organisation think would be the greatest benefits for individuals/sectors that you represent, or the UK as a whole, were the UK to join the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP), and why?

Please supply your answer and any supporting evidence below:

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. Our evidence here reflects our role as our members' specialist agency on issues relating to genetic engineering in food and farming. It does not seek to cover the full range of our members' views in other areas.

Brexit and the negotiation of new international trade deals offers an opportunity to improve standards in farming, food production and consumer labelling. What we want the UK Government to achieve is a race to the top, where the very highest standards of environmental protection, food safety, quality and information for consumers are shared amongst trading partners.

There is significant divergence between current CPTPP members on the regulation of genetic modification. Some members operate high standards of risk assessment, regulation and labelling, while others have few safeguards in this area. A high standards trade deal with this group would, therefore, offer an opportunity to raise the level of environmental safeguarding and consumer information on an international level.

Which of these areas of the CPTPP agreement best describe the benefits that you have outlined above?

Sanitary and Phytosanitary Measures

NGOs - The UK's future trade relationship with the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) - concerns

What concerns, if any, does your organisation have about the UK potentially joining the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP), and why?

Please supply your answer and any supporting evidence below:

GM Freeze, and our member organisations, are deeply concerned that post-Brexit trade deals could tip the balance away from vital safeguards and consumer choice, resulting in a race to the bottom.

As a signatory to the Cartagena Protocol on Biosafety, the UK is responsible for ensuring that environmental risk assessments are carried out for all living modified organisms developed, released or imported into the UK. Several existing CPTPP members not a signatories to the protocol so, in the event of the UK joining the partnership, the UK's responsibility for adhering to this key international standard would be increased while our ability to fulfil its requirements was made more challenging. It is, therefore, vital that any deal with the partnership respects our responsibilities and retains effective safeguards for our food and the wider environment.

Regardless of our international obligations, research indicates that UK consumers back a high standards approach. In April 2018 an IPPR poll [<https://www.ippr.org/news-and-media/press-releases/public-willing-to-sacrifice-us-trade-deal-to-protect-food-safety>] found that, when asked whether the UK should lower food safety standards to secure a trade deal with the US or retain current standards, only 8% of the public thought the UK should lower food safety standards, with 82% preferring to keep standards as they are. This is backed up by research recently undertaken by the consumer organisation Which? looking at food safety and more broadly at quality standards and methods of production.

We know that consumers' appetite for high standards includes a GM-free supply chain because public concern about GM food has actually risen over seven years of the Food Standards Agency (FSA)'s Biannual Public Attitudes Tracker [<https://www.food.gov.uk/science/research/ssres/publictrackingsurvey/biannual-public-attitudes-tracker-survey-may-2017>] (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.

A poll by Bright Blue in April 2017 found that 63% of Conservative voters support a ban on GM crops. [<http://www.brightblue.org.uk/index.php/medias/press-releases/item/713-conservative-voters-want-a-green-brexite-polling-reveals>]

Consumers also place a high value on the opportunity to make an informed choice about what they are eating, including the presence of GM ingredients and the use of GM animal feed. A GfK NOP poll [<https://www.gmfreeze.org/press-releases/two-thirds-want-gm-to-be-kept-off-their-plates-new-opinion-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.

There is significant divergence across current CPTPP members on the issue of GM labelling. Any future deal or partnership that allowed food onto UK supermarket shelves with labelling standards below our own would both deny consumers the right to make an informed choice and diminish trust in our own high standards of food labelling.

It is vital that any relationship between the UK and CPTPP preserves the requirement to label all genetically modified foods sold in the UK.

Which of these areas of the CPTPP agreement best describe the areas of concern that you have outlined above?

Sanitary and Phytosanitary Measures

NGOs - The UK's future trade relationship with the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) - other comments

Is there anything else that you would want to say about the UK's future trade and investment relationship with the existing Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) member countries or about the UK potentially joining the CPTPP?

Please supply your answer and any supporting evidence below:

GM is key area of divergence in agricultural policy between Westminster and the Scottish, Welsh and Northern Irish Governments which all took full and immediate advantage of the opportunity to prohibit the cultivation of GMOs in their own territory, under Directive (EU) 2015/412. Any future UK relationship with CPTPP must recognise and respect the views of the devolved nations, upholding their right to farm GM-free.

As Scotland's then Rural Affairs Secretary, Richard Lohead said at the time [<https://news.gov.scot/news/gm-crop-ban>] "[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."

GM Freeze supports widespread calls for transparency in UK trade negotiations. We want impact assessments (including on the environment and consumer choice) published in advance. We want comprehensive, proactive consultation with civil society, parliamentarians and affected groups in order to set mandates for negotiators in advance. And we want parliamentarians to have sufficient time to debate and vote on prospective trade deals.