

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



Agriculture Bill Inquiry

8 October 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. GM Freeze and many of our member organisations submitted evidence to the Department of the Environment, Food and Rural Affairs consultation on the Agriculture Bill Command Paper, *Health and Harmony*. Our evidence here, as with the *Health and Harmony* consultation, 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.
- 1.3. Our response is not confidential and will be published on the GM Freeze website, www.gmfreeze.org
- 1.4. In summary, the 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 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.
 - Transparency and fairness require compulsory clear labelling of foods containing genetically modified ingredients.
 - 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.

2. Genetic resources and genetic diversity are public goods

- 2.1. Genetic diversity should be specifically recognised as a public good, in addition to biodiversity. 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.
- 2.2. Similarly, genetic resources are a public good and should not be controlled by any individual, group or company. Subsidies should not support private ownership of genetic resources.

3. Required regulation

- 3.1. 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).
- 3.2. The UK must also establish and enforce 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.
- 3.3. 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.

4. Promoting transparency and fairness in agri-food supply chains

- 4.1. 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. [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.
- 4.2. GM labelling also creates a level playing field for UK-produced and imported food products. 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.

5. Provision relating to devolved nations

- 5.1. GM is key area of divergence in agricultural policy between Westminster and the Scottish, Welsh and Northern Irish Governments.
- 5.2. 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.
- 5.3. As noted under 3.2 and 3.3, 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.

Liz O'Neill
Director, GM Freeze