

Response to Bright Blue Call for Evidence

Conservative Manifesto for Conservation

29 November 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 encompass NGOs including the Soil Association, Friends of the Earth and Garden Organic; farmers; retailers; scientists; grassroots campaigners and concerned individuals.
- 1.2. This evidence reflects GM Freeze's role as our members' specialist agency on issues relating to GM in food and farming. We have, therefore, restricted our comments below to Question 7 in the rural issues section of your call for evidence: ***What regulatory approach should the UK adopt on genetic modification and genetic editing in food production after it leaves the EU?***
- 1.3. Our response is not confidential and will be published on the GM Freeze website, www.gmfreeze.org.
- 1.4. In summary, our evidence covers the following points:
 - Brexit offers an opportunity for positive change but only if this change focuses on high standards.
 - The authorisation of GM crops for cultivation or import as food or feed must follow a robust, transparent and consistent process that encompasses social and ethical impacts alongside safety concerns.
 - GM regulation must protect the entire food chain through effective and consistently enforced measures to prevent GM contamination.
 - Consumers want to make an informed choice through clear GM labelling.
 - All forms of genetic engineering, including genome editing should be regulated in the same way as established GM techniques.

2. Brexit as an opportunity for positive change

- 2.1. The UK's exit from the EU offers an opportunity to improve legislation relating to GM in food and farming by focusing on high standards and consumer confidence. Fair rules and sensible protections require a three-pillar approach to GM regulation, covering case by case authorisations for cultivation or import; effective protection from contamination; and clear consumer labelling.
- 2.2. Research indicates that UK consumers back a high standards approach. In April 2018 [an IPPR poll](#) 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.

3. Authorising GM crops for cultivation or import

- 3.1. The authorisation of GM crops for cultivation, or as imported food or feed, must follow a robust, transparent and consistent process that encompasses social and ethical impacts alongside safety concerns and offers meaningful opportunities for consultation with the public and civil society representatives.
- 3.2. Effective GM authorisations will include a rigorous and independent case by case risk assessment that recognises the potential for unplanned genetic changes and for unintended impacts of both planned and unplanned changes to the genome.
- 3.3. GM authorisations should also consider both the direct effects of the GMOs themselves and the impacts of their cultivation. For example, the assessment of herbicide tolerant GM crops should consider the impact of increased application of the associated herbicide on local wildlife, biodiversity and the food or feed produced from the crop.

4. Protection from contamination

- 4.1. GM regulation must protect farmers, growers, beekeepers, food producers and retailers through consistently enforced 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.
- 4.2. The impact of 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.

5. Labelling

- 5.1. For consumers across the UK and beyond, high standards mean GM free and the ability to make an informed choice through compulsory labelling of GM ingredients. There is also strong public support for the labelling of animal products (meat, fish, dairy products and eggs) produced from animals that have been fed GM crops. A [Food Standards Agency commissioned report on GM Labelling](#) found that, “Across the sample, there was broad surprise that labelling was not required to show where GM feed had been used”. Brexit offers an opportunity to meet consumers’ expectations through compulsory labelling of both GM ingredients and GM-fed products.
- 5.2. UK producers and manufacturers will need to comply with EU food regulations to continue to trade in key EU markets. As a result, UK businesses 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.

6. Genome editing

- 6.1. All forms of genetic engineering, including genome editing and cisgenesis (GM that inserts genes from the same or a closely related species) should be regulated in the same way as established GM techniques.
- 6.2. Genome editing has no history of safe use and new concerns are arising regularly. For example, research recently found that the most high profile technique, CRISPR, [produces a much higher level of unwanted DNA deletions than previously thought](#). Even where DNA edits are completed as planned, precision is not the same as predictability. Even single-point mutations can have significant unexpected effects.
- 6.3. Regulation of genome editing does not equate to a ban. Rather, it recognises the powerful potential of these techniques and ensures that they will only be used in instances where their application has been proven to be safe, responsible and fair.
- 6.4. 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. The most practical way to fulfil this key international obligation is to regulate all forms of GM effectively.

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