

National Food Strategy

Evidence from GM Freeze, submitted to
foodstrategycallforevidence@defra.gov.uk



24 October 2019

Introduction and summary

GM Freeze is the UK umbrella campaign for a responsible, fair and sustainable food system. Members include the Soil Association, Friends of the Earth, Scientists for Global Responsibility, Garden Organic, Action Against Allergy, farmers, retailers, scientists and grassroots campaigners.

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

Our response is not confidential and will be published on the GM Freeze website,
www.gmfreeze.org.

In summary, we propose four key ideas for the National Food Strategy:

- 1** High standards achieved through robust regulation of the use of genetically modified organisms (GMOs).
- 2** Informed choice through clear consumer labelling and meaningful public engagement that values lay contributions and incorporates social, ethical and economic impacts alongside scientific analysis.
- 3** Value and protect genetic diversity by discouraging monoculture and opposing the patenting of genetic resources.
- 4** Address root problems within the food and farming system, rather than treating the symptoms.

1 High standards

1.1 We need a robust and transparent process for authorising the cultivation and import of GMOs, including those produced with newer genetic engineering techniques such as genome editing. This must operate across the food chain and take full account of:

- The potential impact of intended and unintended genetic alterations and traits.
- Farming practices associated with GM traits, including the use of herbicides on herbicide tolerant GM crops.
- Social, economic and ethical perspectives.
- Impacts felt where imported food and feed is grown. We cannot export our responsibility for environmental, health, economic or social harms by accepting as imports GMOs that do not meet our own cultivation standards.
- The potential impact of releasing GMOs containing antibiotic resistance marker genes.

1.2 Respecting the “polluter pays” principle, we need an effective liability regime that will ensure fair compensation for UK farmers and any other business impacted by GM contamination or damage incurred as a result of the presence of GM material, including the use of associated pesticides.

2 Informed choice and meaningful public engagement

2.1 Consumer choice is a public good that can only be realised through effective food labelling, supported by full supply chain traceability. Polling¹ found that 89% of people in the UK want GM products to be clearly labelled, with 72% willing to pay extra for non-GM food. The requirement to label GM foods must be retained in UK law and extended to include the use of GM animal feed.

2.2 As detailed in our evidence to 2016’s science communication inquiry² and a peer reviewed report into NGO concerns about genome editing³, there is significant misunderstanding of public and civil society concern about the use of GM in food and farming. Contributions to key debates and deliberations are frequently dismissed because they are not expressed in scientifically accurate terms, or side-lined because they relate to the wider social, ethical or economic impacts of GM crops and/or the farming regimes that they support. Public engagement in food and farming policy must include significant work to explore people’s concerns and understand the issues they raise.

3 Value and protect genetic diversity

- 3.1** Resilience to disease, pest attack, short and long-term climate fluctuations relies on a genetically diverse stock of seed, plants and animals. Genetic diversity should, therefore, be recognised as a distinct public good and supported through policies that discourage monocultures.
- 3.2** Genetic resources are also a public good and should not be controlled by any individual, group or organisation. A civil society letter to UK Ministers and Research Councils in February 2019⁴ urged a change of focus towards farmer-led, agroecological research. That cannot happen if seed and crops are controlled through patenting and restrictive contracts. Public money should not support, in any way, the patenting of genetic resources.

4 Focus on root problems not symptoms

- 4.1** We need to shift the focus of public policy from treating the symptoms to addressing the root causes of problems in our food and farming system.
- 4.2** As detailed in GM Freeze's recent field trial objections⁵, GM biofortification projects will not address and could mask the underlying causes of poor diet. For example, the John Innes Centre's "high iron" GM wheat is intended to increase iron levels in white flour. Rather than creating white sliced bread and doughnuts with elevated iron levels, efforts should focus on understanding and addressing the socio-economic barriers to a healthy, varied diet.
- 4.3** The drive for increased food production similarly misdirects public and policy attention. We already grow enough food to feed the predicted peak world population of 10 billion⁶ but around a third of the food produced worldwide is lost or wasted⁷ and that which is consumed is not distributed proportionately around the world. People are not hungry because there is not enough food to go around, they are hungry because they are poor. A peer reviewed report found in 2017⁸ that NGOs are particularly concerned about the use of a perceived crisis around food security as a justification for the use of genome editing.
- 4.4** A third example, as explained in more detail in our evidence to a recent Nuffield Council on Bioethics Inquiry⁹, is that many of the traits proposed for genome editing in farmed animals, such as polled cattle and disease resistance, would mask the impacts of intensive animal agriculture. Rather than changing animals to fit the system, we must change the system to respect the needs and welfare of the animals employed within it.

Liz O'Neill – Director of GM Freeze

References

- ¹ GfK NOP survey of 1,000 adults in the UK, 2010: <https://www.gmfreeze.org/press-releases/two-thirds-want-gm-to-be-kept-off-their-plates-new-opinion-poll/>
- ² GM Freeze, 2016, Written evidence to the House of Commons Science and Technology Select Committee, Science Communication Inquiry <https://www.gmfreeze.org/wp-content/uploads/2016/10/GM-Freeze-evidence-to-science-communication-inquiry.pdf>
- ³ Helliwell R, Hartley S, Pearce W, O'Neill L, 2017. Why are NGOs sceptical of genome editing? EMBO Reports 18: 2090-2093. <https://www.embopress.org/doi/10.15252/embr.201744385>
- ⁴ Food Ethics Council and others, 2019. Letter to ministers and research councils. <https://www.foodethicscouncil.org/app/uploads/2019/08/Joint-letter-on-food-and-farming-research-Feb-2019.pdf>
- ⁵ GM Freeze and others, 2019. Multi Agency response to GM wheat trial application (19/R52/02) <https://www.gmfreeze.org/wp-content/uploads/2019/02/Multi-agency-response-to-GM-wheat-trial-application-19-R52-02-.pdf>
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- ⁶ Holt-Giménez, E., Shattuck, A., Altieri, M., Herren, H., & Gliessman, S. 2012. We already grow enough food for 10 billion people ... and still can't end hunger. Journal of Sustainable Agriculture, 36: 595-598 <https://www.tandfonline.com/doi/abs/10.1080/10440046.2012.695331>
- ⁷ Food and Agriculture Association of the United Nations. Food loss and food waste. <http://www.fao.org/food-loss-and-food-waste/en/>
- ⁸ Helliwell R, Hartley S, Pearce W, O'Neill L, 2017. Why are NGOs sceptical of genome editing? EMBO Reports 18: 2090-2093. <https://www.embopress.org/doi/10.15252/embr.201744385>
- ⁹ GM Freeze, 2019. GM Freeze evidence to Nuffield Council on Bioethics inquiry: Genome Editing and Farmed Animals. <https://www.gmfreeze.org/wp-content/uploads/2019/09/GM-Freeze-evidence-genome-editing-and-farmed-animals.pdf>