

**GM Freeze submission to Department for Environment,  
Food & Rural Affairs call for evidence:  
Labelling for animal welfare**

Submitted by email to [welfare.label@defra.gov.uk](mailto:welfare.label@defra.gov.uk)

6 December 2021



## **Introductory note**

We have chosen to submit evidence by email because we place a high value on transparency and this format allows us to publish our evidence – exactly as submitted – openly on the GM Freeze website. We have answered all required questions, then chosen to respond in those areas that overlap with our specialist expertise. We have matched all information provided to the relevant question/s and trust that this means that our evidence will be treated equally with that submitted via the Citizen Space web portal and will be included in all reports, summaries and statistical analysis produced by the Department.

## **About you or your organisation**

### **Question 1: What is your name?**

Liz O'Neill

### **Question 2: What is your email address?**

[liz@gmfreeze.org](mailto:liz@gmfreeze.org)

### **Question 3: Would you like your response to be treated as confidential (required)?**

No, this submission is not confidential and will be published on our website at <https://www.gmfreeze.org/publication-category/consultation-responses/>

### **Question 4: Are you responding as an organisation or an individual?**

This submission is made on behalf of an organisation – GM Freeze.

### **Question 5: Which of the below options best describes you?**

GM Freeze does not fit any of the categories listed for this question.

### **Question 6: Please provide a summary of why you chose to respond to this call for evidence, and any relevant expertise you have.**

GM Freeze campaigns for a responsible, fair and sustainable food system, with a specific remit to focus on the impacts of genetic modification in food and farming. Animal welfare labelling supports our high-level aims and has the potential to complement and support public demand for clear labelling of all products of genetic engineering.

### **Question 7: Where are you based in the UK?**

England

### **Question 8: Please provide the name of your organisation**

GM Freeze

**Question 9: Please provide a summary of what your organisation does and where relevant who you have consulted to formulate your response.**

GM Freeze is the UK umbrella campaign for a responsible, fair and sustainable food system, focused on concerns around the use of genetic engineering in food and farming. Our member organisations include large NGOs, scientists, farmers, retailers and grassroots campaign groups. Our submission covers the questions relevant to our role as an expert civil society body. Our member organisations hold a variety of views on broader issues on labelling for animal welfare and some may respond to the call for evidence separately.

**Question 10: Where does your organisation operate?**

England, Scotland, Wales, Northern Ireland

**Question 11: Where are your organisation's headquarters?**

England

**Question 12: What type of organisation are you responding for?**

Non-governmental organisation (NGO)

**Question 13: Does your business source / sell agricultural or food products?**

No

**Question 14: What is the primary purpose of your business?**

GM Freeze is not a business – please see the response to Questions 6, 9 and 12, above.

**Question 15: Please provide your 5-digit Standard Industrial Classification (SIC) code.**

74990 – Non-trading company

## **Labelling for animal welfare**

**Question 17: Should the UK government reform labelling to ensure greater consistency and understanding of animal welfare information at the point of purchase?**

Yes.

**Why?**

Consumers want to know what is in their food and how it has been produced. This view has been expressed clearly and consistently through many surveys, campaigns and other means in recent years.

## Defining welfare standards

**Question 20: What would we need to consider if we developed a set of welfare standards that covered the whole life of the animal, including slaughter and transport, and of its parents? You may wish to refer to specific species you have a particular interest in.**

The use of genetic modification (including so-called “gene editing” GM techniques) must be considered as a key animal welfare issue and explicitly included in any new labelling scheme.

It is well recognised that conventional breeding has resulted in poor welfare outcomes for farmed animals. As these result from the commodification of animals, rather than any deficiency in the process of sexual reproduction, it is reasonable to assume that super-charging the ability to “design” animals will also lead to greater suffering, unless strict Government regulations are imposed to prevent such outcomes. As Danielle Hamm, Director of the Nuffield Council on Bioethics commented on the publication of the council’s report on its in-depth inquiry on genome editing and farmed animals,<sup>1</sup> “The public recognise that our food and farming systems need to change, and it is clear they will not tolerate the introduction of any new technology that takes us further away from high welfare, sustainable farming.”

Even where gene editing is proposed as a solution to welfare concerns, for example with disease resistant pigs or hornless cattle, closer inspection suggests that its use could in fact perpetuate poor husbandry and intensive farming operations. Professor John Dupré, Chair of the Nuffield Council on Bioethics’ working group commented on the publication of the council’s report (referenced above): “Whilst some applications of genome editing - such as disease resistance - sound great for animals in theory, if they were to lead to further intensification of farming then that may well be harmful to the quality of animals’ lives in other ways. Under no circumstances should new breeding technologies be brought in to perpetuate unsustainable food and farming systems. Now is the moment to act to prevent this.”

Regardless of outcome, the process of genetically engineering animals causes significant harm. Gene editing of animals usually includes cloning which, according to the RSPCA<sup>2</sup> and Compassion in World Farming<sup>3</sup>, inflicts very severe or lasting pain on animals, violates their integrity and reduces them to a mere instrument or tool. Cloning is typically only successful 10-25% of the time<sup>4</sup>, meaning that most embryos transferred into hosts’ wombs do not result in a full-term pregnancy and are aborted. For those cloned animals that survive, birth defects are common<sup>5</sup>. Defects include premature death, pneumonia, liver failure and obesity. For example, a study on cloned mice found that up to 4% of the genes were malfunctioning during pregnancy<sup>6</sup>. Microinjection can be used instead of cloning, but this requires a large number of animals to act as surrogates for the implantation of genetically engineered embryos. On average, 24 embryos are needed to produce one gene-edited pig.<sup>7</sup>

Genetic errors can occur as an unintended consequence of genetic engineering, even if new genes are not inserted into the animal. For example, genetic modification (through gene editing GM techniques) for super-muscly animals resulted in rabbits, pigs and goats with enlarged tongues and pigs having an extra spinal vertebra, even though no DNA had been inserted<sup>8</sup>.

The primary mechanism for ensuring that any use of new genetic technologies does not harm animals is the detailed independent risk assessment and welfare evaluation that can be required through GM regulations. However, labelling also has a role to play so it is essential that this is considered within the Government’s plans for animal welfare and method of production labelling.

## Approaches to labelling

**Question 24: Which type of labelling could be most effective at:**

**a. Supporting farmers meeting or exceeding baseline UK welfare regulations by ensuring they are rewarded by the market?** Mandatory labelling

**b. Improving animal welfare by unlocking untapped market demand for higher welfare products?** Mandatory labelling

**c. Ensuring UK baseline and higher welfare products are accessible, available, and affordable so that it is easy for consumers to choose food products that align with their values?** Mandatory labelling

### **Why?**

Only mandatory labelling will provide consumers with a clear set of choices and farmers/food producers with the opportunity to command a better price for higher welfare products and positive environmental outcomes.

**Question 25: To what extent do you support the principle of mandatory labelling to identify when imported meat, eggs and milk do not meet baseline UK welfare regulations?**

Strongly support

### **Why?**

Products that do not meet baseline UK welfare regulations should not be on sale in the UK. Citizens have demonstrated repeatedly that they expect all food on sale here to meet our standards. If food created to a lower standard is allowed for sale it must be clearly identified as such to both inform consumers and protect the interests of UK farmers and food producers.

## Scope and impact of labelling

**Question 43: When eating out, what barriers do consumers face choosing food that aligns with their values on animal welfare? How can these be overcome?** Please provide supporting evidence. We are particularly interested in evidence that quantifies the availability of welfare information or higher welfare options.

GM Freeze regularly receives correspondence from consumers concerned about the unlabelled use of GM cooking oil in catering establishments. As such labelling is already a requirement in law, our experience suggests that enforcement will be key to the success of future animal welfare labelling. This must be built into the structure of new labelling regulations from the start. Our experience with the use of cooking oil suggests that the involvement of, and specialist training for, both food hygiene and trading standards inspectors will be key to the success of animal welfare labelling in the out-of-home sector.

**Question 45: Which of the following options do you think could be suitable for indicating welfare standards within the catering sector? Please select up to 3 that you would be in favour of.**

1. Mandatory labelling of the welfare standard at the point of sale, for example: on the menu

## Monitoring and enforcement

**Question 48: What are the key considerations when designing a monitoring and enforcement regime to verify labels for animal welfare?**

As noted in response to question 43, above, the delivery of enforcement of labelling for animal welfare must be clearly established and resourced from the start, including in the out-of-home sector. Adding an item to existing inspection checklists is likely to be a cost-effective method of enforcement in catering establishments.

## Aligning with wider food labelling reform

**Question 52: Are there non-welfare marketing terms, relating to the provenance or quality of meat, eggs, and milk, that you would like to see defined in law but voluntary to use?**

Yes

**If yes, which terms and why?**

GM-free and similar terms, intended to indicate the absence of genetic modification techniques in the supply chain of any product or dish sold, should be clearly defined. This definition must encompass all genetic technologies (such as gene editing GM techniques) and the use of GM animal feed.

## References

<sup>1</sup> <https://www.nuffieldbioethics.org/news/act-now-to-ensure-animal-welfare-is-at-the-heart-of-plans-to-introduce-genome-editing-into-farmed-animal-breeding-says-independent-ethics-body>

<sup>2</sup> <https://www.rspca.org.uk/documents/1494939/7712578/RSPCA+response+-+Genome+Editing+and+farmed+animals.pdf/77d17c92-0bc5-6eb0-1837-1bc430fbd97f?t=1584525808480>

<sup>3</sup> <https://www.ciwf.org.uk/media/3816935/farm-animal-cloning-report.pdf>

<sup>4</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4882362/>

<sup>5</sup> <https://www.genome.gov/about-genomics/fact-sheets/Cloning-Fact-Sheet#al-6>

<sup>6</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC130555/>

<sup>7</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4882362/>

<sup>8</sup> <https://www.wsj.com/articles/deformities-alarm-scientists-racing-to-rewrite-animal-dna-11544808779>