

Flawed Food Standards Agency consultation on 'precision bred' organisms launched to coincide with Christmas

The Food Standards Agency (FSA) has launched a two-month [consultation](#) on the way that newly rebranded 'precision bred' organisms (PBOs) are regulated, following the passing of the Genetic Technology (Precision Breeding) Act in March. The consultation is timed to coincide perfectly with the busy Christmas period and fails to follow government [guidelines](#) on the duration of public consultations, which should be 12 weeks.

GM Freeze is particularly concerned by the chilling impact that the timing will have on participation by consumer-facing businesses during their busiest time of year. We have written an [open letter](#) of complaint, which you can read on our website. Beyond GM and others have called for the withdrawal of the consultation until problems are addressed, including its "serious misrepresentation of the facts".

Despite the framing of the process as a consultation, here are some things that are **not** up for debate:

a. **The definition of precision breeding** – this is described as using techniques such as gene



Caroline Lucas MP at the Soil Association's annual Peter Melchett Memorial lecture, 2023.

editing to make changes to a genome that "could also have been obtained by traditional breeding techniques."¹ This is despite a growing body of evidence that this is at best "staggeringly imprecise"² and at worst untrue.³

b. **The safety of PBOs** – this was apparently decided in January 2023 by the Advisory Committee on Novel Foods and Processes (ACNFP). The [members](#) of this 'independent' body hold a range

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GM Freeze appoints new Executive Director

GM Freeze is happy to announce that we have appointed Leonie Nimmo as our new Executive Director. Leonie is an experienced campaigner, co-operator and advocate for a safe, fair and sustainable food system.

In August we were very sorry to say goodbye to Liz O'Neill, who guided GM Freeze for nearly a decade. Liz worked tirelessly to challenge the roll out of genetically altered organisms in the



Leonie Nimmo

UK. She will be greatly missed and we wish her all the best.

Leonie joins GM Freeze from the Conflict and Environment Observatory and, prior to that, Ethical Consumer Research Association. She said:

"It would be impossible to try to fill Liz's shoes, however, I'm delighted to be following her at GM Freeze. Thanks to her, we are perfectly positioned to

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of interests in companies and institutions that stand to benefit from its conclusions.⁴

- c. **The labelling of PBOs** – the consultation pack states that it is “not appropriate for us to ask about mandatory labelling”. Two prior FSA consultations have found that consumers overwhelmingly want this,⁵ but apparently the government “has been clear that there are no plans” to require it. This raises the question as to why the public were consulted on this in the first place, as government [guidelines](#) state that consultations should take place

when there is scope to influence policy. The FSA also refer to the lack of provisions for labelling in the Act, however, there are also no provisions for not labelling in [the Act](#). Further, it contains a ‘King Henry clause’ which enables secondary legislation to overwrite provisions in it, even if they did exist.

- d. **The issue of co-existence** – or whose responsibility it is to ensure that ‘precision bred’ organisms do not spill over into other crops, undermining their genetic integrity and making non-genetically manipulated agriculture impossible.

We are somewhat cautious about our next moves due to the fact that the Department for Environment, Food and Rural Affairs (DEFRA) [discounted](#) more than half of the responses to its 2021 consultation on the regulation of genetic technologies because it deemed them to be linked to campaign groups.⁶

Nevertheless, we will continue to work alongside our members, supporters and other stakeholders to demand adequate safety testing, maximum transparency, respect for consumers’ rights and the protection of conventional and organic agriculture.

What you can do: Make some noise!

- The window for FSA responses closes on the 6th of January and we will provide further analysis which may assist those interested in providing detailed responses. In the meantime, for anyone that has a few minutes spare and is unlikely to provide an in-depth response, we urge you to [complete the questionnaire](#) stating, repeatedly, that you “strongly disagree” with the FSA’s plans.

- Please get in touch with any feedback on the consultation questions – can you spot at least one major issue that defies logic?! We’d love to include your reflections in our future communications to members and supporters.
- We are also encouraging people to write to supermarkets, asking them whether they intend to respond to the consultation, and letting them know that now is the time to act to protect their customers’ interests as well as

their own. Nobody would want to be left holding the can if it turned out there were safety issues with new GMOs after all, but the proposed lack of testing means this is a real possibility. The lack of traceability could be a disaster in the event of a product recall. Please check our website for some contact details.

- You can also send complaints, comments and compliments to the FSA at [fct\[at\]food.gov.uk](mailto:fct[at]food.gov.uk).

Who regulates the regulators?

The seriously problematic FSA consultation provided new resonance to a question that GM Freeze’s Leonie Nimmo asked Caroline Lucas MP in November: who regulates the regulators?

At the Soil Association’s annual Peter Melchett Memorial lecture, Caroline was speaking about politics in an age of environmental breakdown.

Leonie reflected that one of the things we have lost with leaving Europe is a whole transparency regime around lobbying. She asked Caroline how we now find out what – in terms of money or ‘science’ – is influencing politicians and policymakers, highlighting the potentially disproportionate influence that the FSA board will have on the drafting of secondary legislation.

The response was not very

encouraging: corporate capture of regulators is an issue; we don’t know a huge amount and there needs to be more oversight. “Pinpointing that as a real gap in our overall governance is massively important,” concluded Caroline.

A [clip](#) of Leonie asking the question is on the GM Freeze website, along with a link to the whole event.

¹ GM Freeze’s position aligns with the 2018 European Court of Justice [ruling](#), which is that gene editing is genetic engineering, and that gene edited crops and animals are genetically modified organisms.

² As [pointed out](#) by Dr Michael Edenborough QC, specialist in intellectual property law, during a parliamentary discussion on the Genetic Technology (Precision Breeding) Bill, in June 2022 (timecode 15:00:00).

³ For example, [see](#) ‘Why ‘New GE’ needs to be regulated’, Testbiotech, Chapter 2 (page 9) and ‘New Possibilities on the Horizon: Genome Editing Makes the Whole Genome Accessible for Changes’, Kwall Katharina, 2019.

⁴ A quick look at one such company, Fera Science Ltd, shows that two individuals from DEFRA sit on the company’s [Joint Venture Board](#). It has won a [significant contract](#) with the FSA which includes an assessment of its own allergen proficiency testing data. The proprietary testing programme, Fapas, includes [testing](#) for GMOs.

⁵ The FSA’s July 2021 [consultation](#) found: “most participants strongly felt that labelling should always tell consumers if there are genome edited ingredients in the product, because transparency is crucial to enable consumers to choose for themselves, and to build consumer trust in genome edited foods.” In the FSA’s March 2023 [consultation](#), just 15% said that it was not important to be informed about ‘precision breed’ products at the point of sale.

⁶ As pointed out in a [report](#) by A Bigger Conversation: “The prevailing assumption is that respondents who use templates are not putting forward views that matter to them personally. In fact, the opposite is likely to be the case.”

Our Year: 2022/3

The year from April 2022 to March 2023 was a tough one for anyone who shares GM Freeze’s vision of a world in which everyone’s food is produced responsibly, fairly and sustainably. Here, we share a brief summary of what happened, how GM Freeze was able to make a difference, and what it all meant for our finances.

The UK Government introduced its Genetic Technology Bill in May 2022 and it was signed into law as the Genetic Technology (Precision Breeding) Act in March 2023. It’s dominance over our work last year is reflected in our coverage of the detail of what the law says – and what we did to try and change it – see [Thin Ice 62](#), [Thin Ice 63](#), [Thin Ice 64](#) and [Thin Ice 65](#).

The GM Freeze team worked throughout year to analyse the content of the Genetic Technology Bill and present the evidence-based case against the deregulation that it will bring. We worked directly with MPs and peers, wrote and shared detailed briefings, drafted amendments and helped others to raise their voices. We also answered a lot of questions covering the technology, the policy implications of the provisions in

the bill and what might go wrong without proper safeguards in place. We submitted formal evidence to a committee of MPs and published four separate briefings for different stages of the Parliamentary process. Having identified a significant knowledge gap around the nature of a range of genetic engineering techniques that are often referred to as gene editing, we also developed and published a briefing that explains in simple terms the scientific basis for our assertion that *Gene Editing is GM with Better PR*.

Throughout the year GM Freeze worked collaboratively with other organisations, meeting regularly and co-ordinating our responses to maximise our collective impact.

While debate was ongoing about the need for proper safeguards on the use of newer GM techniques, developers continued to seek permission to plant open field trials of experimental crops developed with first-generation GM techniques. GM Freeze responded quickly on each occasion, as did our supporters, whose generous donations funded this work through our *Trials and Authorisations Fund*.

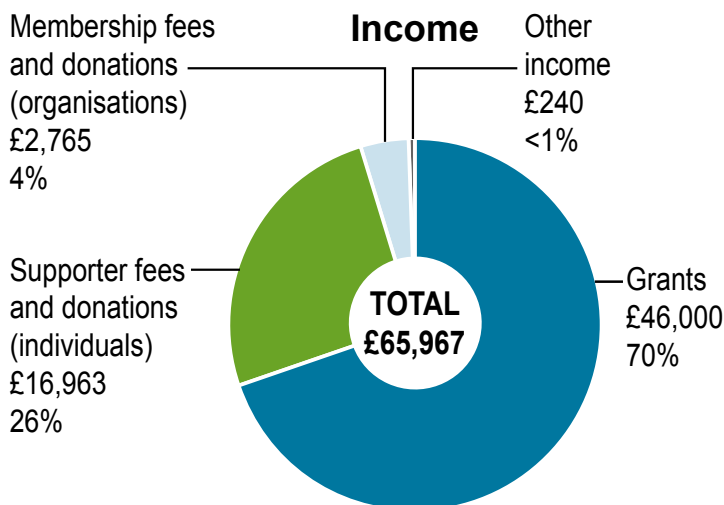
Media interest in our work was strong this year and GM Freeze

was featured or quoted in at least 35 different articles and broadcasts including interviews on BBC and ITV news programmes as well as several BBC radio stations. We also got out and about in person, presenting at the Oxford Real Farming Conference (alongside Vandana Shiva), the Wales Real Food and Farming Conference, the online Seed Sovereignty Gathering, the Good Food, Good Farming March and rally in London and the Championing High Standards Conference in Edinburgh.

Financially the year was positive, with the second tranche of a two-year funding award from the Esmée Fairbairn Foundation and an unexpected core grant of £13,000 from the Movements Trust. Our supporters were as generous as ever, contributing a hugely important quarter of our income in 2022/3 through regular and one-off donations.

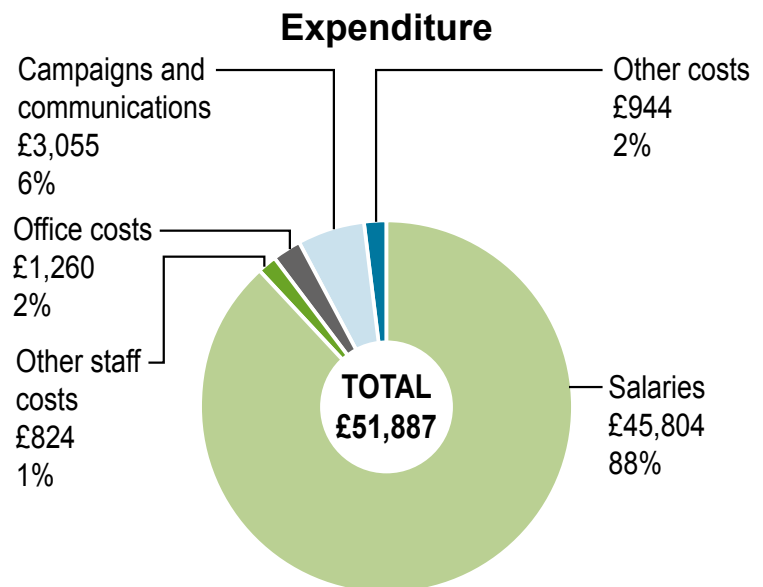
Please see our Annual Report and Accounts for further details on how we: made the case for effective safeguards; helped to plug scientific knowledge gaps; defended our right to choose, and spread the word about the issues.¹

Our finances 2022/23



£394 of grant income received in previous years was brought forward to spend in 2022/3.

£288 of grant income has been carried forward into 2023/4 for ongoing work.



£1,208 of donations to our Trials and Authorisations fund was carried forward into 2023/4 for work carried out early in our financial year.

Detailed accounts can be found on our website.

¹ www.gmfreeze.org/wp-content/uploads/2023/10/G057-final-accounts-2023-version-3-signed.pdf

Dangerous changes, movements of hope

The new Executive Director of GM Freeze, Leonie Nimmo, reflects on a changing environment for GM campaigning, and the role of GM Freeze and our supporters in shaping a fair and sustainable future

The passing of the Genetic Technology (Precision Breeding) Act in March was a seismic shift in the UK's legislative landscape, rebranding some forms of genetically modified organisms as 'gene edited' and potentially removing the safeguards we expect with their development and release. It comes at a time of increasing global demand for technology to provide solutions to human-made problems, not least the existential threat of climate change.

My predecessor at GM Freeze, Liz O'Neill, worked tirelessly on the Act and other things to protect our food and farming system from the unregulated roll-out of genetically modified organisms: from labelling campaigns and responding to field trial applications to lobbying parliament and co-ordinating the UK movement against GMOs. The Act significantly changes the operating environment, which could impact all this work and more. It feels like an important time to take stock and look to the future.

Bad technology?

I have recently been asked whether I think GM technology is inherently dangerous/bad, or whether the only real problem is the increasing corporate power that patents facilitate. It's an interesting and valid question.

These days we are told that the science is more sophisticated than back when genetic modification was primarily about herbicide-resistant and insecticide-producing crops, which have locked farmers into production systems that escalate chemical use. The catastrophic consequences of this are nowhere more evident than in India, where the roll-out of GM cotton has been linked to the suicides of 400,000 farmers,¹ many of whom have drunk the very chemicals intended for use on the land.

My instinct tells me that artificial

modification of genes in relation to the food system is dangerous *per se*, because it is very important that we don't undermine the genetic integrity of seeds (and by extension the future of life on this planet). It would be ridiculous, however, to arrive at the conclusion that genetic manipulation of any kind is 'bad', because science is not sentient. But by the same measure, neither is a particular type of genetic modification, *per se*, 'good'. And regardless of this, I am certain that the deregulation of GM is dangerous. Opposing this will continue to be a key priority for GM Freeze.

Good PR

With the advent of so-called gene editing, designed changes can be made to the pre-existing genetic material (albeit forced by external stimuli).² According to legislators, there is a distinction between this and former types of genetic modification which is so significant that it should mean the removal of regulatory frameworks, safety regimes, traceability systems and labelling requirements.

The distinction is a political construct, and one that encourages us to believe that, whilst the older GMOs might be problematic, the newer ones are not. This is scientifically incorrect and ethically highly contentious. All diseases and genetic mutations involve changing the pre-existing genome. These changes will often

deliver unpredictable results, some of which can become highly infectious, such as with antibiotic resistance or zoonotic diseases.

There are many risks, and we need strong regulatory frameworks with proper safeguards in place around all genetic modification processes. But laboratory experiments alone cannot adequately inform us of the risks, because they do not extend beyond laboratories and into ecosystems. We also need to turn to farmers, and fields, and listen to what informed and engaged producers are saying.

Real resistance

I believe that the food sovereignty movement is one of the most important social movements of our time. Originating in the primarily agricultural global South, it has now spread into the industrialised North, with an unapologetic, coherent demand for self-determination in food production and consumption. It is spearheaded by La Via Campesina – the worldwide movement of peasant producers – which categorically rejects genetically modified organisms, [stating](#) that they endanger farmers' rights to seeds, as guaranteed by the 2018 United Nations Declaration on the Rights of Peasants.

Our members the Landworkers' Alliance, who are also members of La Via Campesina, have a [vision](#) of a regenerative food system that does not compromise the ability of others around the world, or future generations, to provide for themselves. It's a vision I share, and hope that GM Freeze will work to make a reality.

False solutions

I joined GM Freeze from the Conflict and Environment Observatory, where I



Mexican maize varieties show the diversity of landraces. Image: GM Watch

had been researching the converging impacts of climate change, conflict and environmental degradation. I became concerned that GM might increasingly be touted as a solution to climate change, and that finance for climate change adaptation will facilitate the roll-out of genetically manipulated crops in areas where dependence on international markets has already impoverished farmers. The [doubling](#) of agribusiness delegates at the climate Conference of Parties (COP) between 2021 and 2022, alongside the emerging discourse about ‘climate-smart’ agriculture, could be worrying signs. Climate resilience potential [featured](#) prominently in the UK government’s arguments in support of the Genetic Technology Act.

According to the UN, we [face](#) a triple planetary crisis, of climate change, pollution and biodiversity loss. Genetic manipulation threatens to aggravate the last two whilst it is promoted as a techno-fix to the first. Commercial cultivation of GM crops inevitably leads to the contamination of landraces that have been adapted to local conditions. Crops that are developed in a lab and distributed globally create monocultures that are not adapted to local conditions, and cannot be used in the future to breed locally-appropriate varieties. We need to be aware of the dangers that GM crops present to landraces, and our ability to adapt to the changes that are coming.



Climate smart agriculture, BASF-style.
Photo: agriculture.basf.com

In the UK I believe we have a particular responsibility to challenge the concept of gene editing as a climate change solution. On the one hand, technology developed here, or with capital accumulated here, will be exported. On the other, we have a relatively stable and representative political system,³ which has effectively pushed back against GM cultivation to date. As GM Freeze we represent



a crucial voice of civil society; a voice that could echo beyond our island.

Taking stock

In the UK, the outdoor cultivation of GM crops has, to date, been restricted to field trials. Similar restrictions in Europe have protected citizens, producers and ecosystems from the commercial roll-out of GM crops. There are many to whom we owe thanks for this situation, from the activists of the 1990s, to sensible legislators, to consumers, to European beekeepers and beyond. As the supporters and members of GM Freeze, you have played your part in ensuring that in the UK field trials and legislation have been met with informed resistance; pushing back on corporate power, political manipulation and dangerous scientific experimentation.

The Orwellian-named Genetic Technology (Precision Breeding) Act, and parallel legislative processes underway in Europe, are poised to change everything. Where breeding occurs in a lab, and legislation rests on a theoretical, unscientific “[could have](#)”,⁴ our genetic resources – our seed heritage – are at risk. We need to act now to ensure that the secondary legislation, which will come on the heels of the Act, is as robust as possible.

Building an inclusive movement

It’s not just about seeds: much of the Act applies to animals as well. The RSPCA has picked up on the significance of this, [noting](#) that genetically altered animals are now used in almost 70% of all scientific procedures in the UK. It has raised [concerns](#) that the Act could mean a huge step backwards in animal welfare – whether farm animals, pets, or wild species.

Those of us concerned about genetic manipulation are a broad church. We include animal welfare advocates, concerned consumers, the slow food movement, organic farmers, beekeepers, wholefood distributors and the food sovereignty movement. Over the coming months and years I look forward to working with you to amplify our collective demands for a safe, fair and sustainable food system, for people and biodiversity, and a world where animals are treated with respect.

The fight against unlabelled and inadequately safety tested genetically altered life forms has not stopped with the passing of the Genetic Technology (Precision Breeding) Act, it has entered a new phase. And we need to join together to be louder and stronger than ever before.

¹ Dr. Vandana Shiva, [speaking](#) alongside Liz O’Neill at the Oxford Real Farming Conference in 2023.

² Beyond this broad description of gene editing, it is difficult to come up with a statement that is universally true. Contested issues include whether or not the change could have been produced using conventional breeding, whether genetic material from another species remains present in the genetically altered organism, and whether unintended changes present risks and should therefore be monitored. The UK government’s position is in conflict with a 2018 European Court of Justice [ruling](#), which found that gene editing was genetic engineering, and that gene edited crops and animals are genetically modified organisms.

³ Albeit one that is becoming less stable and representative, not least through the passing of a number of Acts of parliament under the current Conservative government.

⁴ The government’s [briefing](#) on the Act states that gene editing technologies produce “traits that can also occur through traditional breeding and natural processes.” As noted above, this is a highly contested issue, not least by the European Court of Justice. See also this [briefing](#) by Organic Farmers & Growers.

INTERNATIONAL NEWS

GM battle in full swing in Europe

Europe is following hot on the heels of the UK in a [push](#) for the deregulation of New Genomic Techniques (NGTs) – [defined](#) as those that were developed after 2001 when the EU [legislation](#) on genetically modified organisms (GMOs) was adopted. This categorisation is roughly equivalent to the UK's preferred term 'precision breeding', but at least it makes sense.¹

In July 2023 the European Commission proposed legislation to deregulate NGTs. As [pointed out](#) by the European Network of Scientists for Social and Environmental Responsibility (ENSSER), "regulation not only allows to identify and trace potential risks, is also helps to assign responsibility and liability." They highlight the fact that if any harm arises from new GM technology, it could "go undetected with no liability on the part of the developers."

A consultation was carried out as part of the EC's Impact Assessment process, but 40 organisations including the European Non-GMO Industry Association (ENGA) [said](#) it was fundamentally flawed and biased.



Organisations [objecting](#) to the EC's consultation.

The European Parliament's committee on the Environment, Public health and Food safety (ENVI) published a [report](#) on the proposed legislation in October. This claimed that any distinction between conventional and "conventional-like NGT plants" is discriminatory. It consequently recommended deleting a requirement for seed bag labelling. It also introduced an amendment to allow NGT plants in organic production which, in an Orwellian twist, it claimed was because "freedom of choice is essential".

IFOAM Organics Europe, the European umbrella organisation for organic food and farming, has [rejected](#) the use of NGT crops in organic agriculture. President Jan Plagge said the EVRI report "invalidates the view of an entire movement".

More than 70 academics have signed an [open letter](#) calling on MEPs to reject the deregulation proposals, which at the time of writing was still open to endorsements. A [petition](#) to keep new GMOs regulated and labelled closed in Europe in November 2022 with more than 420,000 signatures.

What you can do: Get clued up

Are you an organic producer or consumer? Do you know – or are you prepared to find out – how the legislation will affect you? Does the ENVI have the authority to decide organic standards? How do European, international and national organic standards align? Will consumers in the UK end up buying NGTs if they buy certified European organic produce?

We have many questions about the implications of this legislation but GM Freeze is a tiny organisation with capacity constraints. We will do further digging in the future, but in the meantime, please do feed back your knowledge, research and perspectives. The organisations linked to in this article ([ENSSER](#), [ENGA](#), [IFOAM](#)) would be good places to start.

Major win for glyphosate in Europe as its toxic legacy bites Bayer in USA

The European Commission has unilaterally [authorised](#) the use of glyphosate for a further ten years following the failure of member

states to reach a majority decision on the controversial biocide on 16th November. Indian activist Dr. Vandana Shiva [said](#) the ruling is a sign the European Commission doesn't care for science, the earth, citizens or democracy.



Avaaz protest against EC's relicensing of glyphosate in Brussels, Belgium, May 2016.

The very next day Bayer's Monsanto lost the latest in a string of court rulings in the USA over claims that its glyphosate-containing weedkiller Roundup causes cancer. Three former Roundup users now suffering from non-Hodgkin's lymphomas were awarded \$1.5 billion in damages in what is one of the [biggest](#) trial losses in five years of Roundup litigation. This followed three losses for the company in October, costing it [more than](#) \$500 million in damages. [According](#) to Reuters, Bayer still faces nearly 40,000 Roundup-related cases, despite having settled most claims in 2020 for up to \$10.9 billion. The World Health Organisation's International Agency for Research on Cancer [classified](#) glyphosate as "probably carcinogenic to humans" in 2015.

Glyphosate is a key ingredient of the majority of agricultural systems involving GM crops – crops which have been genetically engineered to be resistant to the chemical, which would otherwise kill them. Such production systems now cover significant areas of the planet, particularly in the top five GM crop-producing countries, where [adoption rates](#) of GM soy, maize and canola are close to saturation (USA 95%, Brazil 94%, Argentina 100%, Canada 90%, and India 94%).²

¹ As a group of 100 international scientists and policy experts [pointed out](#) in September 2022, 'precision breeding' is neither precise or involves breeding. The lack of universal names and meaningful scientific definitions point to the classifications as political constructs, created to shield the process from the safety and transparency regulations that apply to 'old-style' genetic engineering.

² In 2019, according to the pro-GM International Service for the Acquisition of Agri-biotech Applications (ISAAA).

The UK's Royal Society: 'Science', lobbying and the media

The Royal Society (RS) released a [report](#) in October calling for the deregulation of all GMOs, not just the newly rebranded ones.¹ The report is co-authored by RS Fellow Jonathan Jones, who has several commercial interests in biotech companies and is a senior scientist at The Sainsbury's Laboratory, which is [responsible](#) for multiple GM field trials.²

In the press release accompanying the report, the Royal Society [bemoans](#) the expense of bringing old-style GM crops to market, arguing "this approach is no longer justified given the evidence from 30 years of commercial use... the UK can learn from other regulators that have greater experience with GM technology, such as the US."

The report lacks scientific rigour in its failure to acknowledge any of the problems associated with US-style GM production, including links to cancer, the development of resistance to biocides in plants and pests, damage caused to non-target species and the contamination of local landraces. Emotive language describing the "burden" of regulation also contributes to the report reading like a GM advertorial.

Nevertheless, it received a Parliamentary [launch](#), attended by the then UK science minister [George Freeman](#), alongside the Chief Scientist at DEFRA Gideon Henderson and Chair of the FSA Susan Jebb. The mainstream media also appeared primed to pick up the report.

Promoting the report on Farming



This is what a Parliamentary Launch looks like. Picture source: APPG Science & Technology in Agriculture X page.

Today, Jones attempted to justify doing away with safety testing GM crops: "There's no point in seeing if they poison rats in 90 day rodent feeding trials because you're not testing any particular hypothesis beyond the rather nebulous one that something bad might happen."

Speaking on the same programme, GM Freeze's Leonie Nimmo said that requiring a justification for a risk assessment before one is undertaken is back-to-front and goes against the Precautionary Principle, upon which our current regulatory system rests.³

She also took the opportunity to pledge that GM Freeze will continue to work with our members and supporters for a fair and sustainable food and farming system and one which is not dominated by a few powerful corporations.

The Farming Today programme was edited fairly, and a similar amount of air time was given to both Jones and Nimmo. A segment on the far more widely listened to Today programme a few hours later, however, did not attempt a balance of opinions, though you can catch a tiny clip of Leonie explaining the Precautionary Principle.⁴ A scientist was able to make a number of claims about a GM tomato that were unchallenged by the presenter but would be highly unlikely to be permitted on product packaging, or to have been subject to independent scrutiny. The same thing occurred two weeks later on Farming Today, in a [promotional report](#) about some genetically manipulated peas,



and this time there was no mention of the controversy surrounding the gene editing process used to develop them.

Some GMOs have been rebranded as being 'gene edited' but one thing has not changed: the wildly optimistic claims that are made about their potential; for feeding the world, benefitting nature and solving climate change. Nice as it would be for us to be able to believe in such claims, they are false. We already know how to solve these problems: we need to distribute food better because there is already enough in the world to feed everyone. We need to use agroecological farming to support nature. And we need to stop GHG emissions if we want to solve climate change. Genetic engineering could make us much more vulnerable to climate change because in the future we will need an uncontaminated resource of seeds. Leonie did provide this commentary to the Today programme, but it did not get used.

What you can do:

- **Send comments and complaints to the BBC online:** www.bbc.co.uk/contact/complaints
- **If you want to question the scientific basis and independence of the Royal Society's research, you can call them on +44 207 451 2500 or email science.policy@royalsociety.org. More email addresses are available at: royalsociety.org/about-us/contact-us**

¹ The Royal Society makes much of its principle of independence, though it receives the vast majority of its funding (more than £100m) from the UK government. It is less candid about the sources of a further £6.6m which it [receives](#) from 'external bodies'.

² Interestingly, though Jones' commercial interests are listed in the report it does not list his employment, therefore it is not made clear that an example given in the report of the development of a GM potato from The Sainsbury's Laboratory is one of the authors referencing [his own work](#).

³ Leonie is at timecode 8:30.

⁴ Leonie is at timecode 55:30.

GM Freeze news

AGM 2023

A big thanks to all that attended our AGM in October, both online and in person in the dizzying heights of the Millbank Tower on the banks of the Thames. Thanks also to The Green Alliance and our member Friends of the Earth for the venue.

GM Freeze Chairperson Kierra Box (Friends of the Earth) provided a review of the year, including our work combatting the Genetic Technology (Precision Breeding) Act and challenging field trial applications. As pointed out by Lawrence Woodward of Beyond GM, our work throughout the year was much enhanced by our collaborative approach and co-ordinating with other organisations.

We had a hugely informative discussion about the current regulatory landscape and the multiple issues facing our movement: from Brexit and the sudden loss of lobbying transparency, to novel allergens, food fraud, transparency and safety. A fundamental problem appears to be an unholy trinity of the FSA, DEFRA and the Advisory Committee on Releases to the Environment

(ACRE), which seem able to bounce responsibilities between themselves. Perhaps unsurprisingly the buck appears to stop with ACRE - the body with the least amount of accountability or democratic legitimacy.¹



Impressive backdrop for our AGM.

New Esmée Fairburn funding

In early October GM Freeze heard that we have been awarded an additional two years of funding from the Esmée Fairburn Foundation. This £60,000 feels like a golden goodbye from our former Director Liz O'Neill; it is very much thanks to her work on the application itself as well as all she has done to shape GM Freeze into an organisation worthy of this support.



What you can do:

- Organisations that support our work can join GM Freeze as a member, and, if you'd like to become more involved, stand for election to our management committee.
- Individuals that support our work can donate, share our resources, take any of the actions in this newsletter or on our website, and get in touch to discuss other actions – [leonie\[at\]gmfreeze.org](mailto:leonie[at]gmfreeze.org)
- Send us your views, perspectives and research – we might incorporate them into our next newsletter.
- This update covers a fraction of the national and international GM news – we highly recommend signing up to the GMWatch mailing list if you want more information.
- Don't forget to sign the Don't Hide What's Inside petition that we run in partnership with BeyondGM if you haven't already! donthide.gmfreeze.org

¹ See also previous segment on Caroline Lucas MP's response to a question from GM Freeze 'Who regulates the regulators' (www.gmfreeze.org/2023/11/02/who-regulates-the-regulators/).

GM Freeze appoints ... continued from page 1

take forward collaborative resistance to the deregulation of genetic modification in the food system that we now face in Britain and further afield."

"I'm very happy to be supported by the GM Freeze management committee, who have already provided valuable guidance, and whose respective organisations add substantial weight to GM Freeze as a significant

voice of civil society in the UK.

"I am committed to working for our members and supporters to realise a more sustainable and fair food system, and one in which genetic diversity is valued as the critical life force we know it to be."

Kierra Box, who represents our member Friends of the Earth, said:

"Leonie has a great track record in both the food and environment sectors, and brings a range of experience

working within cooperative and collaborative structures throughout her career. The GM Freeze management committee are confident that Leonie has the governance and financial skills needed to run the organisation, and the campaigning and relationship-building skills needed to work with other organisations to deliver our strategic goals. She is also extremely passionate about the issues and we're really looking forward to working with her."

GM Freeze is working to help create a world in which our food is produced responsibly, fairly and sustainably. We consider and raise the profile of concerns about the impact of genetic modification. We inform, inspire, represent and support those who share our concerns. We campaign for a moratorium on GM food and farming in the UK. We oppose the patenting of genetic resources.



A referenced version of this newsletter is available online – www.gmfreeze.org/thinice

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