

The Landworkers' Alliance

A grassroots union for farmers, growers and land-based workers

www.landworkersalliance.org.uk



June 9, 2020

Dear Rt Hon George Eustice,

The Landworkers' Alliance farmers' union objects to proposals by the All-Party Parliamentary Group on Science and Technology in Agriculture to exchange the current EU definition of GMO in the UK Environmental Protection Act for a definition compatible with the Cartagena Protocol, and asks that you - as a representative of Government - resists an Amendment to this effect from being inserted into the Agriculture Bill in the House of Lords.

We are clear as a union of farmers that it is of utmost importance for us to align with the regulatory stance of the EU and agree with the Court of Justice of the European Union (CJEU) ruling that these breeding tools should be regulated as GMO's. Changing the UK's definition of a GMO could significantly impact trade with the European Union (EU) because UK farmers and food producers would not be able to meet EU requirements on traceability and labelling of genome edited organisms. EU GMO regulations encompass genome editing techniques on the same basis as older transgenic techniques (where DNA from another species is added to the genome of the target organism). GM seed, crops, food, feed and ingredients are subject to detailed regulations covering risk assessment, approvals, traceability and consumer labelling. If the UK exempts genome edited GMOs from regulation, it will be impossible for UK farmers and food producers to meet EU requirements as they will have no way of identifying whether or not their seed, crops, food and feed contain genome edited GMOs. The impact through lost markets could be devastating; 60% of UK agricultural exports currently go to the EU so this could finish off many farming businesses.

We also note that the farming sector will not benefit from these precision breeding technologies. Genome editing is a form of genetic modification that changes an organism's own DNA in the lab rather than adding genes from another organism. It has no history of safe use and can give rise to inaccurate edits, unexpected effects at the organism level and unintended consequences when released into the environment. When considering regulation there is no meaningful distinction between 'simple' and complex genome edits as even tiny molecular changes can cause complex and far reaching impacts. For example, the devastating blood disorder, sickle cell disease is caused by a single point mutation that changes just one base pair of nucleotides (the smallest unit in the genetic code). Regulation is a safeguard not a ban, and without regulation genome edited organisms would be released on our farms and in our food with no risk assessment, monitoring, traceability or consumer labelling. We are concerned of the potential for harm and cross contamination of organic crops which will offset any potential benefits.

Our understanding of the proposed amendment is that it will pave the way for yourself as the Secretary of State for the Environment, Food and Rural Affairs to exempt a wide range of genetic engineering techniques from regulation without further Parliamentary scrutiny. This represents a significant shift of power from Parliament to Government, reducing democratic accountability on a sensitive and hotly debated issue. Published correspondence referring to the planned amendment mentions the power to "consult and effect change" but the scope, terms of reference and status of any consultation would need to be mandated in significant detail before its inclusion would provide any assurance that public concerns and the concerns of stakeholders, such as our farmers' union, would be given appropriate weight in ministerial decision making.

Parliamentary scrutiny is essential as public opinion is broadly sceptical of GM, and a poll by Bright Blue found that 63% of Conservative voters would support an outright ban on GM crops. Consumers also place a high value on the opportunity to make an informed choice about the presence of GM ingredients and the use of GM animal feed. A GfK NOP poll found that 89% of people in the UK wanted GM products to be clearly labelled and 72% were willing to pay extra for non-GM food. Changing the definition of a GMO to exempt genome edited crops from regulation will remove traceability and consumer labelling requirements, denying people an informed choice about what they are buying and eating. As a farmers' union we want consumers to trust the food they buy. This Amendment would undermine that trust and consumer confidence in the farming industry.

Thank you for resisting this ill-conceived Amendment.

Yours sincerely,

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Landworkers' Alliance policy lead

