



5 October 2022

We are writing to you, as leaders from civil society and the food and agriculture sector, who are committed to ensuring that all citizens have access to high quality, nutritious food produced by environmentally friendly, sustainable farming.

We are deeply concerned about recent developments in the UK and EU that could lead to a deregulation of GM food:

- In the EU, the European Commission has stated that current GMO regulations are no longer fit for purpose and should be reviewed for GM plants engineered with so-called “new genomic techniques”, like gene editing<sup>1</sup>. It aims to propose new legislation for those GM plants before the summer of 2023.
- In the UK, the government has already introduced a new bill<sup>2</sup> that would exclude both gene-edited plants and animals from existing GMO regulations. The bill creates a false distinction between what it calls “precision bred organisms” (“PBOs”) and other types of genetically modified organisms (GMOs). Government guidelines<sup>3</sup> have been devised to capture the widest possible range of genetically modified organisms within the definition of a “PBO”.

The techniques used to create these organisms have been shown to be imprecise and to lead to genetic changes that could compromise food and environmental safety. Indeed, the European Court of Justice ruling of 2018<sup>4</sup> states that “the risks linked to the use of those new techniques...might prove to be similar to those which result from the production and release of a GMO”.

If these deregulation plans go ahead, existing requirements for GMO risk assessment, traceability and labelling would be abandoned for a wide range of genetically modified organisms. Breeders, farmers, food and feed processors, retailers and consumers would no longer know where these GM plants and animals are in the system and would have no way to avoid them. This would mean a loss

<sup>1</sup> [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_1985](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_1985)

<sup>2</sup> <https://bills.parliament.uk/bills/3167>

<sup>3</sup> <https://www.gov.uk/government/publications/acre-guidance-on-genetic-technologies-that-result-in-qualifying-higher-plants>

<sup>4</sup> <http://curia.europa.eu/juris/documents.jsf?num=C-528/16>

of control over all value chains for the entire food sector, which is responsible and liable for the products it sells.

In the UK, the Regulatory Policy Committee has severely criticised the UK government for not taking into account the full impact – on businesses, consumers and multiple other stakeholders – of taking away regulatory, traceability and labelling requirements<sup>5</sup>.

### **Retailers need to be proactive**

There is a strong business case for retailers to take action now. Supermarkets are already experiencing significant supply chain disruptions in moving regular inventory items; these disruptions can only increase when newly deregulated gene edited/GMO goods come to market. Own brand products which are not compatible with trade partners' regulations would also require a dual recipe inventory unless they specify that no gene-edited or GMO ingredients have been used.

The differentiated timing of the UK and EU developments also has implications for trade within the EU and UK internal markets. Businesses that operate across the EU and UK could end up having to operate a dual inventory system, which would be subject to expensive and time-consuming testing.

As some EU retailers have acknowledged, deregulation means you would “run the risk of selling untested and unlabelled GMOs – both in plant-based foods and in foods of animal origin”<sup>6</sup>. The UK fresh produce industry has stated that plans for deregulation have been pushed ahead without the necessary public conversation and not considered the impact on industry.<sup>7</sup> In addition, serious concerns are being raised about the welfare implications of the deregulation of gene edited animals.<sup>8</sup>

### **Consumers demand the right to know**

Market research throughout Europe indicates that the majority of citizens are skeptical towards old and new GMOs. An Ipsos opinion poll<sup>9</sup> conducted in early 2021 across 27 EU countries shows that the vast majority (86%) of Europeans who have heard of genetically modified (GM) crops want food produced from these plants to be labelled as such. It also shows that the majority (68%) of respondents who have heard of new GM techniques, such as CRISPR, want food produced with these techniques also labelled as GM.

Current GMO regulations in the EU and the UK require the labelling of GM food products, and consumers are not ready to abandon their right to know. Unlike seed developers who operate behind the scenes, food producers and retailers are public-facing and will risk bearing the brunt of any public/consumer backlash if policies are weakened.

### **Support strong regulation**

As retailers, you have the power to shift the balance away from short-term technofixes towards ecological farming systems that promote longer-term sustainability. We are asking you to:

- Join the existing coalition of European retailers advocating for the continued regulation and labelling of all GM food under existing GMO regulations;

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<sup>5</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1085223/2022-06-16-RPC-DEFRA-5170\\_1 - Genetic Technologies Precision Breeding Bill f .pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1085223/2022-06-16-RPC-DEFRA-5170_1_-_Genetic_Technologies_Precision_Breeding_Bill_f.pdf)

<sup>6</sup> [https://www.enga.org/fileadmin/user\\_upload/pdf/Retailers\\_Resolution\\_03\\_11102021.pdf](https://www.enga.org/fileadmin/user_upload/pdf/Retailers_Resolution_03_11102021.pdf)

<sup>7</sup> <https://www.thegrocer.co.uk/fruit-and-veg/fresh-produce-industry-urges-government-caution-following-gene-editing-announcement/667842.article>

<sup>8</sup> [https://www.farminguk.com/news/gene-editing-bill-a-serious-setback-for-animal-welfare-rspca-warns\\_60462.html](https://www.farminguk.com/news/gene-editing-bill-a-serious-setback-for-animal-welfare-rspca-warns_60462.html)

<sup>9</sup> <https://www.greens-efa.eu/en/article/news/opinion-poll-on-the-labelling-of-gm-crops>

- Refrain from giving any explicit or tacit support for government plans to remove labelling and traceability and therefore hide GMOs in the food supply chain;
- Re-affirm and update existing GM policies in relation to own brands so that they explicitly prohibit gene edited products, in light of consumer attitudes.

By listening to your customers and opposing GMO deregulation, you have an opportunity to demonstrate leadership, grow your business and protect nature.

Yours sincerely,

**Aeternus Vita s.r.o.** (EU)

**Arbeitsgemeinschaft bäuerliche  
Landwirtschaft e.V.** (Germany)

**A-Team Foundation** (UK)

**Beyond GM** (UK)

**BigBarn** (UK)

**Biodynamic Association** (UK/EU)

**Biodynamic Association Certification** (UK)

**Biodynamic Association of Denmark**  
(Denmark)

**Biodynamic Federation Demeter  
International** (International)

**Community Supported Agriculture  
Network** (UK)

**Compassion in World Farming** (UK)

**Corporate Europe Observatory** (EU)

**Demeter CS** (Czech Republic)

**Doves Farm Foods** (UK)

**ETC Group** (UK/EU)

**European Coordination Via  
Campesina** (EU)

**European Non-GMO Industry  
Association** (EU)

**Farms Not Factories** (UK)

**Feedback** (UK)

**Friends of the Earth Europe** (EU)

**Gaia Foundation** (UK)

**Générations Futures** (France)

**Global 2000 – Friends of the Earth** (Austria)

**GM Freeze** (UK)

**GMWatch** (UK)

**Green Christian** (UK)

**IFOAM Organics Europe** (EU)

**Kindling Trust** (UK)

**Landworkers' Alliance** (UK)

**Mums Say No to GMOs** (UK)

**NOAH - Friends of the Earth** (Denmark)

**Nourish Scotland** (UK)

**Občianska iniciatíva Slovensko  
bez GMO** (Slovakia)

**OGM Dangers** (France)

**Organic Farmers & Growers** (UK)

**Organic Trade Board** (UK)

**PAN-UK** (UK)

**Pasture for Life** (UK)

**POLLINIS** (EU)

**Rare Breeds Survival Trust** (UK)

**Real Bread Campaign** (UK)

**Real Farming Trust** (UK)

**Real Seeds** (UK)

**Save Our Seeds** (Germany)

**Schweizer Allianz Gentechfrei** (Switzerland)

**Sciences Citoyennes** (France)

**Seed Co-operative** (UK)

**Seed Sovereignty UK & Ireland  
Programme** (UK/EU)

**Seeds of Italy** (UK/EU)

**Sheepdrove Trust** (UK)

**Slow Food Deutschland** (Germany)

**Slow Food Europe** (EU)

**Slow Food in the UK** (UK)

**Slow Food Italia** (Italy)

**Slow Food Netherlands** (Netherlands)

**Soil Association** (UK)

**Sustain** (UK)

**Sustainable Food Trust** (UK)

**Union Nationale de l'Apiculture  
Française** (France)

**Prof Erik Millstone, University of Sussex** (UK)

**Whole Health Agriculture** (UK)

**Wildlife & Countryside Link** (UK)

**Za Zemiata – Friends of the Earth** (Bulgaria)