The regulation of genetic technologies
Sustainable Food Trust Response

To refer to the consultation questions, please go to

Q 1.

The Sustainable Food Trust believes that organisms developed using genetic technologies, and the actual processes which are used to develop them, should continue to be regulated as GMOs. Gene editing allows the potential for far greater changes to plant and animal DNA than is possible with current breeding methods. While this is what makes gene editing attractive to its advocates, in our view it will lead to increased risks because it will be so much more widely applied. Changes achieved through gene editing cannot be compared to traditional breeding. Gene editing can result in unintended genetic changes which cannot easily be controlled or accounted for.

The European Court of Justice ruled that organisms produced by gene editing should be classed as GMOs following a two-year long review of scientific evidence. We see no reason to take a different approach now that we are no longer a part of the EU.

Shifting to ‘product-based’ rather than ‘process-based’ regulation gives the public no assurance that possible errors which arise during the production of an organism are identified and dealt with.

Despite the requirement by the Cabinet Office Consultation Principles that consultations include validated impact assessments of the costs and benefits of the options being considered, this consultation lacks any such assessment of impact, nor does it consider the direction that adoption of such technology may take agriculture and the impact this may have.

This is an issue of significant concern to the public and requires more information and citizen engagement.
Q 2.

Organisms produced by GE or other genetic technologies pose a greater risk of harm to human health and the environment.

While gene editing technologies are more precise than previous methods of genetic modification, we are concerned that their widespread uptake will enable current exploitative farming practices to continue rather than addressing the fundamental problems facing the long-term future of food production. They therefore treat the symptoms rather than the causes of problems in our food system.

Widespread uptake of gene editing technology could have devastating consequences for agricultural diversity by further narrowing the gene pool of crops and animals. This could negatively affect, through cross breeding or pollen transfer, the commercial viability of farms where, for ethical or other reasons, a choice is made to use only traditional varieties or species.

Gene editing is a new technology and we do not yet fully understand its potential impacts. We would therefore recommend regulation is maintained, along with independent scrutiny and further public engagement.

Q 3.

We are concerned that this consultation does not consider where this technology will take agriculture and whether this is the course we should be setting given the increasing challenges we face in our food system. We are particularly concerned that more than 40% of UK arable soils are degraded or seriously degraded and that such soils will not be able to maintain full productivity in the future. The introduction of gene edited crops, which may be high yielding, is likely to exacerbate this problem still further when what is really needed is a more fundamental review of the sustainability of typical current crop rotations.

We are also concerned about the impact on trade, particularly with the EU, of allowing unregulated and unlabelled genetically modified products into the food chain. If the EU continues to maintain its current position, which we hope it will do, we can foresee a situation where food produced in the UK could be rejected by the EU to the detriment of the commercial viability of UK agriculture. This could even cause future problems relating to trade between England and the devolved nations. There have been many examples of farmers in the US suffering severely as a result of the corporate control of genetically modified crops. We are concerned that similar situations could arise in the UK.
We are concerned about the potential welfare impact for animals that have been genetically modified. Experience teaches us that commercial pressures will force breeders to focus on growth rates rather than other factors which can result in animals that grow more quickly than their metabolisms are able to support, and cause pain or other health problems.

Using gene editing of animals to address problems caused by industrial farming simply sees animals housed indoors, in cramped conditions and perpetuates a system which denies animals the opportunity to exercise their full range of behavioural needs.

People must have the right to choose, as such we feel strongly that both strict regulation and labelling of genetically engineered crops and animals is essential.

Q 4.

We do not have adequate experience to answer this question but believe that all forms of gene editing should be subject to GM regulations.

Part Two
Q 1.

Gene editing and similar technologies are new and untested and involve creating organisms through a means which does not exist in nature. This process can have unintended results and as such should require separate regulation which accounts for their specific risks. The regulation of this area is not transparent or independent and is therefore vulnerable to vested interests. Greater citizen engagement and parliamentary scrutiny is needed.

Q 2.

GMO legislation should apply to gene editing. Assessment of social, ethical, welfare, environmental and economic risks should also be carried out.

The impact of gene editing technology on the future structure and type of agriculture we want in the UK should be considered and a systemic approach taken to addressing problems in the food system.
We would call for the Government to be bold in committing to an agroecological, regenerative and nature-based approach to food production, if we are to address the crisis we face today in a genuinely sustainable way.