

Genetic Engineering in agriculture

Positive pathways for safer food systems

In May 2024, under direction from DEFRA (Department Environment, Food & Rural Affairs), the Food Standards Agency (FSA) drafted pieces of secondary legislation aimed at a commercial rollout of products containing genetically modified organisms within the definitions of the Genetic Technology (Precision Breeding) Act March 2023. When the Prime Minister called a General Election all work on government policy was halted.

At that time the FSA had only shown stakeholders some sections of the drafted legislation and so far we have yet to see their proposals in full. From what we have seen, and discussed with FSA staff and members of the FSA board, the proposals are not yet sufficient to assure safe delivery as intended by the Act.

The biggest questions concern traceability. DEFRA have mandated that UK Organic Control Bodies must handle new GMOs, which are referred to as 'PBOs' under the Act, in the same way we would with any other GMO; as such they are to be excluded from organic food and farming. However, whereas GMO legislation requires traceability, the new 'PBO' legislation does not.

We are continuing to discuss these issues with colleagues including the Biodynamic Federation and the Soil Association. Together we have been - and are continuing to ask - both the FSA and DEFRA to acknowledge the need for traceability of any material that could contain 'PBOs'.

The previous government's approach had been that companies manufacturing products with genetically engineered material as defined under the terms of the new Act would be allowed to hold back key pieces of information if the Company themselves deemed that information to be commercially sensitive. Without full disclosure it begs the question how this would offer assurance of safety in food and farming. Certainly it wouldn't support us in maintaining the integrity of organic supply lines.

We require a framework for identification. Labelling would be the usual pathway, as it can be digital, and that digital footprint can be traced. To enable such traceability we would require access to a full register of events, as is currently used for [GMOs across the EU](#).

We believe that such straightforward solutions are entirely workable under UK legislation. For example, a full register with fully disclosed information pertaining to genetically engineered material due for commercial release to be held on a secure site with access granted only to key agencies such as the FSA, and Control Bodies such as UK Organic Control Bodies.

We are now waiting on the new ministerial teams at DEFRA to be fully briefed by their staff before we can recommence our dialogues with DEFRA policymakers.

The science is clear on the risks that the new and very powerful technology of genetically engineering using tools such as CRISPR-Cas pose when used in food and farming, as opposed to use in medicine. The big challenge we have is in helping agencies and commercial entities come to understand the threats and to recognise the risks. And to accept their responsibility as part of a shared approach to maintaining UK biosecurity.

It is entirely reasonable to suggest that we can all help build a framework for responsible delivery and that we can all continue to work across food and farming supply lines to ensure safety and security for our food, our environment and for our economic wellbeing.

Meanwhile, the **European Union** have also been discussing how to handle genetically engineered material that could be for use in food and farming. Here is a very brief update from our colleagues at [IFOAM Organics Europe](#):

"The Hungarian presidency* of the Council of the EU published a non-paper at the beginning of July, delineating 9 outstanding issues with the NGT proposal and asked Member States to send in their input on the non-paper. IFOAM Organics Europe welcomed this approach of opening up comprehensive discussions and wrote a letter to ministries and permanent representations. Member States (MS) have submitted their feedback to the non-paper. Some highlights here:

- Most MS support the compromise proposal from February and ask for the presidency to take it as a starting point.
- Only Sweden and Denmark have supported the proposed option to allow NGTs in organic farming. So, the ban of all NGTs in organic has large support in the Council.
- However, most MS agree that seed labelling is sufficient to ensure the freedom of choice.
- After a governmental change, Greece has changed its position to be very critical of NGTs.
- There are some divergent opinions (also from Pro-NGT countries) as to the compliance with the Cartagena protocol and the inclusion of sustainability criteria.

*The Council of the European Union is co-legislator of the EU alongside the European Parliament. Presidency of the EU Council holds responsibilities for the functioning of the Council. Presidency rotates around EU Member States every six months. Hungary holds Presidency currently (1 July-31 December). "

Online you can read the [Organic sector letter to FSA Board September 2023](#).

And here, from our Briefing Note on the new Genetic Technology (Precision Breeding) Act, are key [Facts about CRISPR-Cas](#).

If you have any comments or questions about any of the issues raised please contact OF&G's business development manager, [Steven Jacobs](#).

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