



Beyond GM
Response to National Food Strategy - Call for Evidence
25 October 2019

Beyond GM is a not-for-profit, public interest initiative to engage citizens in a debate/discussion about the use of genetic engineering technology in food and farming.

Our core aims are: a) to move this discussions out of the prejudiced silos and beyond the “usual suspects” of campaigners, lobbyists and the hidden agendas of the research establishment; b) to highlight that the problematic issues in food and farming cannot be solved by “silver bullet” technological approaches but can only be found in broad based, transparent and systemic change; and c) to explore, through “safe” engagement and conversations, the hidden ground of shared values, disputed values and confused values that exist between different protagonists over questions of e.g. regulation, innovation, public/private good, knowledge transfer and technology roll out, equity and access in relation to policy, markets and risk assessment.

As members of the Sustain Alliance for Better Food Farming and as associates of the English Organic Forum we endorse and support the broad thrust of their submissions to this consultation process.

We wish to focus specifically on the potential role of genome editing in any future strategy for UK food and farming. In particular, we wish to make the following points:

- 1) The “gung-ho” approach of the UK government towards genome editing as presented by statements from the Prime Minister, Defra Ministers and the UK Research establishment is misplaced, erroneous in its claims and needs to be subjected to independent review and consideration.
- 2) Comments made by Henry Dimbleby around the launch of this consultation indicates a similar perspective which runs counter to the precautionary principle and ignores the mounting research evidence that a cautious and more balanced approach to this technology would be more appropriate to a long term sustainable and equitable food and farming policy.
- 3) We feel that including the government’s industrial strategy as part of the base line considerations of the consultation may raise a conflict of objectives in a national food strategy. To be clear: linking national economic goals predicated on the packaging and export of patents and intellectual property rights with the goals of creating a sustainable, equitable, transparent and healthy food and farming system seems to us to be untenable. If this is an honourable and honest approach, it is muddled and misguided.
- 4) To date all consideration of the application of gene technology in the UK has been: a) devoid of open and wide-ranging public engagement; b) has failed to consider independent scientific review which barely exists due to the corporate and IPR driven capture of taxpayer funded research

institutions; c) has failed to consider need and public interest; and d) has not considered alternative approaches to solve the cited problem, thereby ignoring the precautionary principle and stifling non “silver bullet” technologies.

These points are based on our experience of engaging citizens but also, and most tellingly, individual scientists and developers who work with genome technology in the context of a “safe place” provided by Chatham House Rule conversations.

These conversations are published on our A Bigger Conversation [website](#) and reveal:

a) A more realistic perspective of the potential benefits, limitations and drawbacks of genome editing technology than the hype emanating from government, the research establishment and the media acknowledge

b) The significant presence of off-target and unintended effects of genome editing which are not subject – and not propose to be subject – to any meaningful risk assessment for either environment or human and animal health.

c) An across the board acceptance that there should be some form of regulation beyond the ephemeral “light touch” proposed by government

d) The need for transparency and labelling of the products of genome editing and the farming and processing systems that use them

e) A need for and willingness to accept greater and more substantial citizen engagement in the decision making relating to the use of tax payer money in research and development

f) More transparency in the ownership of IPR arising from taxpayer funding and the commercial roll out of genome technologies

In summary, we support the support the idea of radical and systemic change in our food and farming system as envisaged in the submissions of Sustain and the English Organic Forum. In relation the genome technology we urge caution, independent assessment and review and greater citizen engagement in a transparent decision making process.

Overall, we hope that there will be a move in food and farming from an obsession with “silver bullet” technologies towards more sustainable system change.