



Guidance on completing the consultation on Plant Varieties and Seeds Framework for Precision Bred Plant Varieties 2025

REMEMBER: The consultation closes 14 April 2025 at 11:59pm

It is our firm view that a **mandatory** list of precision-bred varieties, compiled and maintained by the government, and **mandatory** labelling is essential to establishing a credible audit trail which, in turn, ensures farmers, growers, gardeners, food processors, retailers and consumers have a choice in what they use and buy.

In many places the questions in this consultation refer to “your business” but, ultimately, you do not have to be “in business” to be impacted by these proposals. They fundamentally affect the ability of all participants in the farming and food supply chain to choose. So, please, do not be put off by references to business. Your right to choose whether or not to buy or use genetically modified precision-bred organisms (PBOs) is your “business”.

On 2-3 April, Beyond GM hosted a series of web meetings with key stakeholders to discuss the consultation. Many concerns were raised about the tricky nature of the consultation questions including how they appear to be worded in a way that might encourage respondents to answer ‘yes’ when they actually mean ‘no’ (and vice versa).

Some felt they would like guidance on how to answer and we have produced this document in response. We hope it is helpful!

Here are some useful links:

- **Defra information about the consultation and link to online consultation form:** [Plant Varieties and Seeds Framework for Precision Bred Plant Varieties - Defra - Citizen Space](#)
- **PDF of the questions:** [Consultation document with information and questions](#)
- If you would prefer not to use the online form, you can submit a written response. You should make sure you include your name, contact details, why you are responding – and also indicate whether you give permission for your response to be published. We strongly advise you to indicate which numbered question(s) you are answering. The link to send an email response is: Defra-Plant-Varieties-and-Seeds@defra.gov.uk

Section 1: About you

Questions 1-8 are about you and your business and your interest in this issue

Section 3: Precision Bred Plant Variety List for England - consultation questions

9a. Based on the explanation in the supporting information, do you understand the proposed process and requirements for the Precision Bred Plant Variety List for England for agricultural and vegetable plant varieties? (Please select one option only) [Yes / No / Unsure]

We recommend you say **'yes'**.

9b. Please explain your answer to the previous question [Free text]

This is an opportunity for you to lay out anything you think is unclear in the proposals, or any criticisms you have with the consultation itself. You may also wish to state here that mandatory listing and labelling are preferable to any voluntary schemes that the government may be considering and will provide greater reassurance and clarity for businesses and other stakeholders.

10a. Do you think the proposed Precision Bred Plant Variety List for England for agricultural and vegetable plant varieties will impact your business? (Please select one option only) [Yes / No / Unsure]

Broadly the answer is **'yes'** but see below.

10b. If you answered yes to the previous question, what changes do you anticipate your business will have to make to adhere to the new legislation? (Please select all that apply)

- administration changes
- system changes
- other changes

This is a tricky question – and it might be phrased in this way so that Defra can argue that a mandatory list is too expensive to bother with. Even if mandatory listing does lead to changes in your business, these are likely to be minor compared to the impact of no mandatory listing (or indeed mandatory labelling as in section 5 below) and we encourage you to make this point strongly. If you think the question is a bit tricky you can choose not to tick any of these boxes and explain why in 10c below.

10c. Please provide further details of any changes your business may have to make to adhere to the new legislation. [Free text]

There is an opportunity to frame all your answers that follow and emphasise that mandatory listing and labelling and therefore identification of PB varieties is essential and that without it the impacts on your business will be much greater.

11a. Do you think the proposed Precision Bred Plant Variety List for England for agricultural and vegetable plant varieties will benefit your business? [Yes / No / Unsure]

Answer **'yes'** here - a List is essential, and it must be mandatory.

11b. If you answered yes to the previous question, what benefit(s) do you think the Precision Bred Plant Variety List for England for agricultural and vegetable plant varieties may have on your business? [Free text]

Here you can argue:

- It must be mandatory.
- Any criteria you want about it being searchable, easily accessible etc.
- Any extra information you want on the list.

We also suggest describing how it will positively impact your business to have a mandatory listing.

12a. Do you think the proposed Precision Bred Plant Variety List for England for agricultural and vegetable plant varieties will have a negative impact on your business? [Yes / No / Unsure]

We recommend answering **'no'** here.

12b. If you answered yes to the previous question, what negative impact(s) do you think the proposed Precision Bred Plant Variety List for England for agricultural and vegetable plant varieties may have on your business? [Free text]

13a. Do you think your business will incur extra costs because of the proposed Precision Bred Plant Variety List for England for agricultural and vegetable plant varieties? [Yes / No / Unsure]

Answer **'no'** here unless having the list will cost your business money – in which case please fill in the free text option below (13b) explaining what these costs are and emphasising why the cost impact might be much greater without the mandatory list.

13b. If you answered yes to the previous question, what costs do you think your business will incur because of the proposed Precision Bred Plant Variety List for England for agricultural and vegetable plant varieties? [Free text]

14a. Do you agree to the publishing of notifications of the Precision Bred Plant Variety List for England in the Plant Varieties and Seeds Gazette? [Yes / No / Unsure]

Answer **'yes'** here - the list should be available in as many places as possible.

14b. Please explain your answer to the previous question. [Free text]

Publication in the Gazette increases transparency and should be mandatory, but shouldn't be the only means of accessing the information. Here is a place to say that, and to suggest other ways you'd like the information (e.g. a searchable list, labels).

Emphasise that these are in addition to, not instead of, a mandatory listing.

Section 5: Labelling of seed and other plant reproductive material produced using precision breeding technologies - consultation questions

15a. What information, if any, on precision bred plant varieties is important to your business? [Free text]

Use this space to list what information your business needs to stay GM-free/comply with organic regulations/maintain a segregated supply chain etc.

15b. In what format should this information be made available? (For example, an accessible list or register) [Free text]

Examples here could be:

- On the labels for seed and other plant reproductive material.
- On marketing materials accompanying seeds e.g. catalogues.
- On a mandatory Precision Bred Plant Variety List, available online, user friendly and fully searchable.
- In any relevant trade and regulatory documents to ensure full traceability at all stages of the supply chain, from seed to sale.

16a. Would the mandatory inclusion of precision bred status on labels for seed and other plant reproductive material to identify them as precision bred have a positive impact on your business? [Yes / No / Unsure]

Answer **'yes'** here if you support mandatory labelling.

16b. If you answered yes to the previous question, what positive impact(s) do you think the mandatory inclusion of precision bred status on labels for precision bred seed and other plant reproductive material may have on your business? [Free text]

This is a chance for you to begin to make the business case for mandatory labelling (this is more of a narrative here, costings are explored in detail in Q19).

17a. Would the mandatory inclusion of precision bred status on labels for seeds and other plant reproductive material to identify them as precision bred have a negative impact on your business? [Yes / No / Unsure]

Answer **'no'** here if you support mandatory labelling.

17b. If you answered yes to the previous question, what negative impact(s) do you think the mandatory inclusion of precision bred status on labels for precision bred seed and other plant reproductive material may have on your business? [Free text]

18a. Do you think your business will incur extra costs if the mandatory inclusion of precision bred status on labels for seed and other plant reproductive material identifying them as precision bred was introduced? [Yes / No / Unsure]

Answer **'no'** here to support mandatory labelling (unless mandatory labelling will cost your business money) - in which case fill in the free text option below (18b) below explaining what these costs are and emphasising the cost impact would be much greater or have more adverse impact without mandatory labelling.

18b. If you answered yes to the previous question, what costs do you think your business will incur due to the mandatory inclusion of precision bred status on labels for precision bred seed and other plant reproductive material? [Free text]

19a. Do you think your business will incur extra costs if no mandatory requirement to include precision bred status on labels for seed and other plant reproductive material is introduced? [Yes / No / Unsure]

Answer **'yes'** here to support mandatory labelling.

19b. If you answered yes to the previous questions, what costs do you think your business will incur if no mandatory requirement to include precision bred status on labels for seed and other plant reproductive material is introduced? [Free text]

This is where you outline the business case for mandatory labelling. Defra wants to know how much it will cost you not to have mandatory labelling on the packets, including:

- Administrative costs for checking lists and introducing/maintaining segregation on computer systems etc.
 - Any supply chain audits you envisage.
 - Legal and reputational risk costs.
- Market/customer confidence in your products, your business and your integrity.

This section is very important to demonstrate that mandatory labelling is good for businesses – which is what Defra will value in this consultation

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