



Defra Consultation

**Plant Varieties and Seeds
Framework for Precision
Bred Plant Varieties**

Why – and how to – respond



Why respond?

- **Affects all businesses**
- **Seed companies, plant breeders, farmers and growers, food companies and even retailers want and need to know**
- **Recognition and labelling here is the start of a credible audit trail**
- **Protect the integrity and legal status of organic, artisanal, traditional and non-GMO conventional plants and foods**
- **Protect customers' right to choose – or refuse**



What do we want?

- **MANDATORY LIST OF GMO PRECISION-BRED SEEDS AND PLANT MATERIALS**
- **LABELLING OF ALL GMO PRECISION-BRED SEEDS AND PLANT MATERIALS**



Background and terminology

- Precision Breeding = Genetic Modification
- UK-only term
- PBOs > GM-PBOs
- Government argues that GM-PBOs are equivalent to traditionally-bred plants
- Genetic Technology (Precision Breeding) Act 2023 removed risk assessments and all existing labelling requirements for GM-PBOs
- New regulations will make this Act operational from Autumn 2025



PB Variety List and Seed Labels?

- Defra consultation proposes
 - 1) Mandatory precision bred plant variety listing
 - 2) Mandatory labelling of precision-bred seeds and other plant reproductive material.

- But nothing is guaranteed! It's not in the consultation but...

Defra also considering voluntary non-legislative options, such as a register maintained by BSPB.

THIS IS OUR LAST CHANCE TO ENSURE GM-PBOs ARE LABELLED & TRACEABLE



Devolved nations

- This will impact the whole UK seed market
- UK Internal Market Act (UKIMA)
 - Once a GM-PBO can be sold in England, it can also be sold in Scotland and Wales BUT it must comply with GMO laws before use (e.g. planting, harvesting)
- Windsor Framework (Northern Ireland)
 - UKIMA doesn't apply. GM-PBOs must meet EU GMO laws before they can be listed, sold or certified in NI
- All farmers (not just organic/Non-GMO) in the devolved nations need clear info on whether a seed is GM-PBO



Section 2

Precision Bred Plant Variety Listing

Process mirrors that for non-PBO plant varieties, with some exceptions:

- Confirmation of PBO status from Defra
 - 1) Letter of confirmation
 - 2) Unique identifier
- Approval duration of 10 years, with renewal options available
- Potentially a different fee structure



Section 2

Information on the listing

- Species, name and a description of the variety
- Date the variety was accepted onto the list
- Summary of all the facts on which the acceptance was based
- (Possibly) a unique identifier to confirm/cross-check with the FSA precision breeding public register
- Date the listing will expire
- Name and address of the maintainer
- Details of 10-year renewals



Section 3

Precision Bred Plant Variety List Questions

- **Q9 a/b** – Do you understand the proposed process and requirements?
- **Q10 a/b/c** – Will it impact your business?
- **Q11 a/b** – Will it benefit your business?
- **Q12 a/b** – Will it have a negative impact?
- **Q13 a/b** – Will it incur extra costs?
- **Q14 a/b** – Do you agree with publishing listing notifications in the Plant Varieties & Seeds Gazette?



Section 4

Mandatory Labelling of Precision-Bred Seed & Plant Material

- **Supplier's Labels:** For smaller packages of seed, provided by the supplier with required information.
- **Official Labels:** For other packages of seed. Label provided by APHA label contractor.
- **Vegetable propagating material:** a supplier's document would be required, which must also state that the variety is precision-bred
- **Seed Potatoes:** Must have an official label and a UK Plant Passport for marketing. Small retail sales (<50kg) can use a notice placed close to the seed potatoes.



Section 5

Mandatory Labelling Questions

- **Q15 a/b** – What precision-bred information is important to your business, and in what format?
- **Q16 a/b** – Would mandatory “precision-bred” labels have positive impacts?
- **Q17 a/b** – Would mandatory labels have negative impacts?
- **Q18 a/b** – Would mandatory labels create extra costs?
- **Q19 a/b** – Would there be costs if no mandatory labelling requirement is introduced?



Impact on Organic & Non-GMO Supply Chains

Voluntary listing, no labelling	Mandatory listing and labelling
Consumer trust weakened	Consumer trust strengthened
Risk of inadvertent contamination	Clear segregation possible
Undermines organic standards	Protects organic integrity
Threatens organic and non-GMO markets	Protects organic and non-GMO markets

A voluntary approach leaves supply chains vulnerable, while a mandatory list with labels aids transparency and provides market protection.

