

2 June 2025

Daniel Zeichner MP
Minister of State
Department for Environment, Food and Rural Affairs
Seacole Building
2 Marsham Street
London SW1P 4DF



Dear Minister Zeichner,

RE: Misleading Use of “74% Cost Saving” Claim for Reduced Regulation in Parliamentary Debates on Genetically Modified “Precision Bred” Organisms

I am writing to lodge a complaint about the repeated use of a misleading statistical claim during recent Parliamentary proceedings relating to the deregulation of genetically modified precision bred crops and to request an immediate correction of the parliamentary record.

Specifically, the statement that *“current regulations add a stifling 74% to the cost of marketing for businesses”* has now been repeated both in the House of Commons Delegated Legislation Committee debate by Emma Hardy MP and in the House of Lords final debate on the Genetic Technology (Precision Breeding) (Food and Feed) (England) Regulations 2025 by Baroness Hayman of Ullock.

We previously submitted a complaint regarding the misleading statements made by Emma Hardy MP (letter dated 8 April 2025, copied to you and others). Amongst these misleading statements was this “74%” claim. Despite a follow up on 15 May, this complaint is still outstanding.

We now ask that, as the responsible Minister, you take steps to correct the public record in both Houses.

In her statement on 6th of May, Baroness Hayman misquoted the source for the figure as the 2023 report by the Swedish AgriFood Economics Centre. That report misrepresented the findings of a 2021 paper by Bullock *et al*, which compared the economics of gene editing (GE) to genetically modified (GM). In quoting this “74%” figure, both Ms Hardy and Baroness Hayman have seriously misrepresented the substance and implication of an economic ‘think piece’ based on broad and conjectural economic assumptions:

- The 74% “saving” does not refer to regulatory costs or “costs of marketing.” Rather, it refers to a reduction in breakeven acreage – the theoretical minimum number of acres that must be planted with a new trait in order to recover the cost of research and development (R&D).

- This reduction in breakeven acreage stems primarily from, presumed rather than proven, technical and developmental efficiencies in gene editing (e.g., higher precision, faster development cycles, and higher probability of success), not from deregulation.
- Even when regulatory costs are factored in, the Bullock paper finds they account for **only about 3%** of the total savings. Therefore, attributing the 74% figure solely or even primarily to current regulatory burdens is incorrect and misleading.

This latter point is important since R&D costs are often conflated with regulatory costs, when they should be accounted for separately.

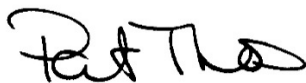
This gross misrepresentation has now entered the parliamentary record twice and may influence Parliamentarians' understanding of the issues, public perception and policy direction on a flawed basis. Moreover, the implied suggestion that regulation is the main obstacle to commercialisation continues to be both analytically weak and potentially harmful to sound policy.

In light of the continued and seemingly wilful misrepresentation of this 'benefit' of deregulating genetically modified precision bred organisms, we request:

1. **An immediate correction** to the parliamentary record in both the Commons and the Lords debates, clarifying that the 74% figure does **not** represent regulatory or marketing costs.
2. **An official apology** acknowledging that these claims were wrong and repeated in error and may have misled Parliament and the public.
3. **A commitment** to uphold a truly evidence-based debate around genetically modified precision-bred organisms in farming and food and to avoid unsubstantiated claims (economic or otherwise) in future regulatory discussions.

We believe that maintaining factual integrity in policymaking, especially on matters of science, regulation, environment and public health, is of the utmost importance. We would be grateful for your urgent attention to this matter and look forward to your response.

Sincerely,



Pat Thomas

Director

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