

17 July 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: Urgent Follow-up - Outstanding Parliamentary Complaints Regarding Misleading Statistical Claims on Genetically Modified "Precision Bred" Organisms

I am writing to express serious concern about the government's failure to respond to or address two formal complaints submitted to your department regarding misleading statements made in Parliament about genetically modified "precision bred" organisms.

First Complaint - Emma Hardy MP Statements (8 April 2025) Beyond GM submitted a detailed complaint over three months ago regarding misleading statements made by Parliamentary Under-Secretary Emma Hardy MP during the Delegated Legislation Committee meeting on 31 March 2025. This complaint highlighted multiple misrepresentations, including a misrepresented "74% cost saving" benefit for removal of regulations and a wildly misleading annual opportunity cost figure of "\$182 billion to \$356 billion" for the UK, as well as mischaracterising PBOs as non-GMOs, and misleading assertions about "foreign DNA" usage.

Despite a follow-up on 15 May 2025, this complaint remains completely unacknowledged.

Second Complaint - Baroness Hayman Statements (2 June 2025) Over six weeks ago, we submitted a further complaint regarding Baroness Hayman of Ullock's repetition of the same misleading "74% cost saving" claim in the House of Lords final debate on the Genetic Technology (Precision Breeding) Regulations 2025 on 6 May 2025.

This complaint also remains acknowledged.

The Core Issues: Multiple Misleading Parliamentary Statements

While both complaints highlight the repeated misuse of the "74% cost saving" statistic, Emma Hardy's statements exemplified a systematic pattern of reckless misrepresentation across multiple areas:

The Misleading "74%" Claim:

- The 74% figure refers to a reduction in breakeven acreage, not regulatory or marketing costs
- This reduction stems primarily from assumed technical efficiencies in gene editing, not deregulation
- Even when regulatory costs are considered, the original Bullock paper finds they account for only approximately 3% of total savings
- The figure has been misattributed to a Swedish AgriFood Economics Centre report that itself misrepresented the primary research

The Misleading "\$182 billion to \$356 billion" Claim:

- Ms Hardy twice quoted "\$182 billion to \$356 billion" annual opportunity cost figures that relate to the EU, not the UK
- These figures cover all genetic technologies, not specifically precision breeding for food and farming
- The projections are based on speculative McKinsey Institute modelling that assumes perfect implementation without factoring in environmental risks, regulatory challenges or public resistance

Mischaracterisation of PBOs as Non-GMOs:

- Emma Hardy validated claims that precision-bred organisms are not genetically modified organisms, contradicting scientific consensus and the law itself
- The Genetic Technology Act 2023 explicitly defines PBOs as products of "modern biotechnology" – genetic modification as defined by the Genetically Modified Organisms (Deliberate Release) Regulations 2002.
- This misrepresentation distorts the debate around PBOs and serves to obscure legitimate concerns about economic and environmental impact, supply chain integrity and consumer choice

False Claims About "Foreign DNA":

- Ms Hardy endorsed factually incorrect assertions that gene editing does not use DNA from exogenous or unrelated species
- The gene editing process typically involves introduction of foreign DNA via plasmids or bacterial vectors

- Government advisors have acknowledged that gene-edited organisms may contain unintended foreign DNA, potentially producing novel proteins with unknown health effects

Unsubstantiated Benefit Claims:

- Assertions that precision breeding "will increase food production, reduce the need for pesticides and fertilisers, lower emissions and reduce costs for farmers" lack empirical evidence
- These claims ignore the limited commercial success of gene-edited crops globally and the failure of early market entrants like Calyxt

Failure to Address Parliamentary Oversight Concerns:

- Ms Hardy omitted reference to the Regulatory Policy Committee's assessment of Defra's Impact Assessment as "not fit for purpose"
- No mention was made of the Secondary Legislation Scrutiny Committee's regret that comprehensive impact assessment has still not been undertaken

Consequences of Government Inaction

The government's failure to address these complaints has allowed multiple misleading statements to:

- Remain uncorrected on the parliamentary record in both Houses
- Continue influencing parliamentary and public understanding across fundamental aspects of the technology, its regulation and economic impact
- Potentially shape policy decisions on an incorrect factual basis spanning scientific definitions, regulatory frameworks and economic projections
- Undermine evidence-based policymaking on matters of science, regulation, environment and public health
- Create a parliamentary discourse based on strategic misrepresentation rather than transparent, factual analysis

Immediate Action Requested

Given the extended period of government silence on these serious matters, we now request:

1. **Immediate acknowledgement** of both outstanding complaints and explanation for the delay in response
2. **Comprehensive correction** of the parliamentary record in both the Commons and Lords debates, addressing the misrepresentations of economic benefits as well as the mischaracterisation of PBOs as non-GMOs, and false claims about foreign DNA usage

3. **Official recognition** that these multiple misleading claims were incorrect and may have systematically misled Parliament and the public across key aspects of the technology and its regulation
4. **Commitment to evidence-based debate** ensuring future parliamentary discussions on genetically modified precision-bred organisms rely on verified, substantiated claims rather than industry speculation
5. **Procedural review** of how your department handles parliamentary accuracy complaints to prevent similar delays in future

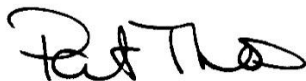
As the responsible Minister for this policy area, you have a duty to ensure parliamentary statements made by government representatives are factually accurate across all aspects of the technology, its scientific basis, regulatory framework and economic implications. The continued presence of demonstrably false information spanning multiple fundamental areas on the parliamentary record, despite detailed evidence of widespread inaccuracies, raises serious questions about the government's commitment to transparent, evidence-based policymaking.

We believe the integrity of parliamentary debate and public trust in government requires prompt action to correct these multiple misrepresentations. The issues raised are not matters of opinion or interpretation, but concern the demonstrable misuse of scientific evidence, legal definitions and statistical data in support of government policy.

We urge you to treat this matter with the seriousness and urgency it deserves. The failure to respond to parliamentary accuracy complaints for over three months is unacceptable and undermines both democratic accountability and evidence-based governance.

We look forward to your immediate response and swift action to correct the parliamentary record.

Sincerely,



Pat Thomas

Director

Beyond GM | A Bigger Conversation

pat@beyond-gm.org

cc:

Rt Hon Steve Reed MP, Secretary of State for Environment, Food and Rural Affairs

Alistair Carmichael, Chair, Environment, Food and Rural Affairs Committee

Lucy Powell, Leader of the House of Commons

Baroness Smith of Basildon, Leader of the House of Lords