



ELECTION 2026

# Food, Farming and Genetic Technologies

## A Scottish Perspective for Responsible Governance

The May 2026 Scottish Parliament election takes place at a defining moment for Scotland's food system. While Westminster has pressed ahead with the Genetic Technology (Precision Breeding) Regulations 2025 – removing the labelling, traceability and risk assessment requirements that have protected consumers and the environment for decades – Scotland has, to date, held its ground. That position now needs not only to be maintained but actively built upon.

Precision bred organisms (PBOs) are genetically modified organisms. The rebranding should not obscure what they are or how they are made.

Scotland's existing regulatory alignment with EU GMO rules reflects a considered judgement – shared by the Scottish Government, Scottish farmers, food businesses, consumers and civil society – that caution, transparency and public consent are not obstacles to innovation. They are the conditions that make innovation legitimate.

This briefing sets out why the next Scottish Parliament and Scottish Government should maintain, strengthen and articulate that position – and why the question of genetically modified organisms must be understood as central to Scotland's food system, not peripheral to it.

## Scotland's Position: The Context

### A Devolved Choice

The [Genetic Technology \(Precision Breeding\) Act 2023](#) and its [2025 Regulations](#) apply to England only. Agriculture, food safety and environmental protection are devolved competencies and both Scotland and Wales have explicitly rejected the Act's approach, choosing to continue regulating gene-edited organisms under the existing, rigorous GMO rules.

This divergence was not accidental. The Scottish Government has been unambiguous: it remains

'wholly [opposed](#) to the imposition of the Act and will not accept any constraint on the exercise of its devolved powers.' When Westminster invited Scotland to join the legislation – in a letter sent the day before the Bill's introduction, after the invitation had already been given to the media – the manner of that invitation told its own story. Devolved nations were not partners in this process; they were afterthoughts.

The challenge Scotland now faces is that Westminster's legislation does not stop at the border.

## The Internal Market Problem

Scotland's devolved position on GMOs faces its most significant challenge not from scientific argument but from the institutional framework within which those powers operate. Under the UK [Internal Market Act 2020](#), products lawfully marketed in England – including unlabelled, untraced PBOs – can be placed on the Scottish market regardless of Scottish regulatory preferences.

This is not a hypothetical problem. While Scotland can prevent the growing of PBOs in Scotland, its power to exclude them from its shops and supply chains is severely constrained.

This is a direct constraint on devolved democratic decision-making. Labelling and traceability are not bureaucratic details. They are the instruments through which democratic choices about food are given effect.

If Scottish consumers cannot be told what they are eating – if Scottish retailers cannot distinguish PBO products from non-PBO products – then the practical exercise of Scotland's GMO regulatory powers is severely weakened.

## Precision Breeding Is Genetic Engineering

The language of 'precision breeding' is a political invention, not a biological description. Precision bred organisms are the products of genetic engineering – laboratory-based interventions in the DNA of living organisms. The UK Government acknowledged this in the first part of the Genetic Technology Act itself, even as its public communications systematically avoided the language.

This is not a matter of semantics. It determines the appropriate regulatory framework, the scope of environmental risk assessment required and the information that consumers and farmers are entitled to receive.

The ongoing judicial review of the Precision Breeding Regulations 2025, [with a High Court hearing in May 2026](#), tests directly whether these regulations are

lawful – including whether they breach the Human Rights Act, the Aarhus Convention and the Cartagena Protocol on Biosafety. The outcome matters for Scotland as well as England.

To call a genetically engineered organism a 'precision bred' one is to reframe the debate in ways that foreclose legitimate public scrutiny. The next Scottish Parliament should use accurate language and require others to do the same.

## The Case for Regulatory Continuity

The Westminster government has argued that precision breeding is simply a faster form of conventional breeding and therefore requires no special regulatory scrutiny. This argument is scientifically contested and legally consequential.

The EU's [2018 European Court of Justice ruling](#), the EU's ongoing cautious approach to new genomic techniques, the Swiss requirement for dignitary assessments of living beings: these reflect a broadly held international view that caution is warranted.

New research has demonstrated that gene editing can cause [lasting disruption to genome function](#) through what scientists describe as 'chromatin fatigue' – even when DNA appears to have repaired itself. The Westminster government's assumption that precision equals safety is not established science. It is a regulatory choice made in the absence of evidence, not on the basis of it.

The EU is now considering its own revised regulations for gene edited organisms (called New genomic techniques or NGTs in Europe). These will also be lighter-touch and yet indications are that there will still be important precautionary differences between the English regime and those in Europe that could, for instance, impact trade.

Scotland's alignment with EU GMO regulation is not just a political gesture. It is the application of the precautionary principle to an area where the evidence base remains incomplete and the consequences – genetic spread in open ecosystems, impacts on biodiversity, contamination of non-GMO supply chains – may be irreversible.

# Scotland's Food System: What's at Stake

## A Food System Question

Proponents of PBO deregulation routinely frame the debate as one between science and ignorance, between innovation and obstruction. This framing is misleading and should be firmly rejected. A government that evaluates these technologies solely through the lens of science and innovation – without considering health, climate, nature, animal welfare, consumer choice and the economic interests of the non-GMO, organic and artisanal sectors – is not doing its job.

## The Clean, Green Brand

Scotland's food and drink sector – worth £19 billion to the Scottish economy and employing around 123,000 people – depends on exactly the kind of rigorous, precautionary, transparency-led approach to food production that the Westminster regulations abandon.

It is also built on values – provenance, quality, environmental stewardship – that are directly threatened by the introduction of unlabelled, untraced GMOs into the supply chain. Organic and biodynamic producers have a legal obligation to avoid GMO contamination.

Geographical indication producers – from Scotch whisky to Scottish salmon to Stornoway Black Pudding – face real challenges from supply chain contamination that they may have no means to detect or prevent.

The Westminster regulations remove the traceability infrastructure that would allow these risks to be managed. A system that cannot track PBOs through the supply chain cannot protect brands that depend on the integrity of their production methods.

An equitable co-existence between GMO and non-GMO farming is not simply a matter of maintaining buffer zones. It requires robust detection methods, mandatory reporting of field trials and liability frameworks that ensure those who deploy novel organisms bear the costs of any contamination.

## Consumer Choice and Public Trust

Eight in ten people in the UK want all genetically modified organisms to be [labelled and traceable](#) through the food chain. In the absence of labelling, consumers cannot exercise meaningful choice.

They cannot reward the farmers and food businesses whose practices they support, nor avoid those they do not. The Food Standards Agency's own [public consultation on precision bred food](#) found clear public support for labelling – and was subsequently set aside. The Scottish Parliament has an opportunity to demonstrate that democratic governance of the food system means something: that public views, honestly gathered, lead to policy outcomes that reflect them.

## The Scottish Research Base

Scotland has genuine strengths in plant science and crop improvement. These strengths are best deployed in a regulatory environment that promotes transparency and public trust rather than one that bypasses it. Scotland's farmers – particularly those dependent on the EU export market for seed potatoes – have good reason to be cautious about any further regulatory divergence from the EU that could add barriers to trade.



*Trust begins with transparency. Most consumers want to know if their food has been genetically engineered.*

# Policy Asks for the Next Scottish Parliament

Beyond GM calls on all parties contesting the May 2026 Scottish Parliament election to commit to:

## 1. Maintain Scotland's regulatory position on GMOs

The next Scottish Government should reaffirm Scotland will not amend the Scottish GMO regulatory regime to remove precision-bred organisms from the category of regulated GMOs. This commitment should be explicit in any coalition or confidence-and-supply agreement formed after the election and should be accompanied by a clear statement of the principles – precaution, transparency, public consent – on which it rests.

## 2. Embed GMO policy within a coherent food system strategy

Questions of genetic technology in food and farming should not be treated as specialist or peripheral concerns. The next Scottish Government should ensure that consideration of GMOs and PBOs is integral to all food strategy and agricultural policy discussions, including any review of Scotland's Good Food Nation commitments. Scotland's [Good Food Nation \(Scotland\) Act 2022](#) provides a framework for exactly this kind of whole-system thinking – it should be actively used.

## 3. Challenge the Internal Market Act's application to food safety standards

The next Scottish Government should pursue, through intergovernmental mechanisms and, where

necessary, through legal challenge, the protection of Scotland's right to set and enforce food safety and environmental standards in devolved areas.

## 4. Require full transparency in PBO field trials and environmental monitoring

Any precision-bred or gene-edited organisms undergoing field trials in Scotland should be subject to mandatory public notification, full environmental assessment and long-term monitoring. The Scottish Parliament should legislate to require this and should ensure that the costs of any monitoring or remediation fall on the developers of these organisms, not on the public or neighbouring farmers.

## 5. Ensure meaningful public engagement in food technology governance

The next Scottish Parliament should establish a standing mechanism for genuine citizen engagement in decisions about genetic technologies in food and farming. This should not be a consultation that feeds into decisions already taken, but a participatory process – drawing on Scotland's experience with citizens' assemblies – that gives people a meaningful role in shaping how these technologies are evaluated, regulated and, if appropriate, deployed.

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## About Beyond GM

Beyond GM is a UK-based organisation working to raise public awareness and engagement in the debate about genetic modification in food and farming. We do not reject genetic modification outright, but we believe there are multiple legitimate and unanswered questions about the use of genetic technologies in our food system. We support an agroecological model of farming that is transparent, democratic and ecologically responsible. Find us at: [beyond-gm.org](http://beyond-gm.org)