

# Judicial Review of the Genetic Technology (Precision Breeding) Regulations 2025

*Summary of Beyond GM's case*

May 2026

The judicial review brought by Beyond GM and its co-claimants will be heard in the High Court over two days, 12-13 May 2026.

It is not about whether precision breeding/gene-editing technologies (which are recognised as a category of genetic engineering technologies) should exist. It is about whether the Government acted lawfully in removing important safeguards when introducing a new regulatory regime for gene-edited organisms.

The core of our case is that the Regulations remove key forms of transparency – including traceability, labelling and targeted testing – without properly assessing the consequences for farmers, food businesses, consumers or the environment.

Specifically our case argues that:

- Without meaningful end-to-end traceability, organic farmers and businesses are unable to meet their legal obligations and maintain certification, market access or consumer confidence. Under UK and international law, organic operators are legally obliged to exclude all GMOs (including precision bred organisms, or PBOs) from their supply chains. Therefore, organic systems depend on being able to identify and avoid genetically modified material throughout the supply chain.
- Government failed to properly investigate or understand the likely effects of the Regulations before bringing them into force. These include the impact of removing traceability on supply chains, the consequences for organic and non-organic businesses, the implications for trade, including exports to the EU and whether the system would function in practice.
- The Regulations must function alongside existing laws that require protection of important habitats and wildlife sites. It is unclear how those protections will apply to gene-edited organisms and how existing environmental protections for habitats and wildlife sites can operate in practice. We argue that the regulatory framework may prevent environmental risks from ever being properly assessed in practice. This is because PBOs are removed from the scope of important existing environmental protections, including the Environmental Damage Regulation.
- The Regulations also restrict the ability of regulators to apply tests that are specific to gene-edited products. Instead, they require these products to be assessed in the

same way as ordinary food products (e.g. for chemical hazards, plastic or metal fragments or microbial contamination such as *E. coli*). We argue that this limits proper risk assessment, undermines traceability and constrains regulators from addressing specific features of the technology, *e.g.* off-target effects such as the creation of novel allergens or toxins as a result of the gene editing process.

In summary, the question before the Court is this: can a regulatory system function without traceability, transparency, proper assessment and regulatory foresight? Our position is that the Government removed safeguards and transparency without properly understanding or anticipating the consequences, creating a system that cannot reliably protect supply chains, informed consumer choice or effective environmental oversight.