



Professor Susan Jebb
Chair
Food Standards Agency
Floors 6 &7, Clive House
70 Petty France
London
SW1H 9EX

By email to: [REDACTED]

Cc: precisionbreeding@food.gov.uk

31st May 2022

Dear Professor Jebb

The Genetic Technology (Precision Breeding) Bill

Thank you for your letter of 16th May 2022, welcoming the Genetic Technology (Precision Breeding) Bill and reiterating the FSA's commitment to maintaining high standards of food and feed safety in the UK.

We note that the Bill includes provisions that may or may not provide traceability for exempt GMOs (those defined as Precision Bred Organisms, PBOs) in the food chain and may or may not require adverse effects on human and animal health and the environment to be avoided. We also note that the Bill does not require exempt GMOs to be labelled.

Since your email expresses a wish for further engagement, we would like to remind you that:

- Traceability and labelling are essential to allow GM-free products (including organic products) to continue to be sold, and to allow UK food and feed products to be traded with countries where GMOs that are exempt under the Bill continue to be regulated. Failure to ensure traceability could lead to massive costs to farmers, food manufacturers and retailers if products are rejected by consumers, manufacturers, traders, importers, or retailers when the presence of unauthorised GMOs cannot be guaranteed.
- Traceability and labelling are also essential for imported products, which could contain exempt GMOs and end up in untraceable or unlabelled products that might also be exported on to other countries.
- Traceability and labelling are essential to allow consumer choice and maintain consumer trust in the food chain.

53 Milton Road ♦ Cambridge ♦ CB4 1XA ♦ UK
Phone: +44 (0)330 0010507 ♦ E-mail: mail@genewatch.org
Website: www.genewatch.org

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- Traceability and labelling are essential to allow products to be withdrawn if anything goes wrong.
- Health and environmental risk assessments are also essential to protect human health and the environment.

If the FSA is to maintain its stated commitments to consumers, and trust in the food chain, it is essential that all GMOs (including so-called PBOs) are labelled and that traceability and risk assessments (for the environment and health) are mandatory.

Yours sincerely,

Dr Helen Wallace

Director

GeneWatch UK