

## GeneWatch UK response to the FSA's consultation on the Proposed Approach to Retained EU Law for Food and Feed Safety and Hygiene

October 2018

GeneWatch UK is a not-for-profit organization which aims to ensure that genetic science and technologies are used in the public interest. Our consultation response is therefore focused mainly on legislation regarding genetically modified (GM) crops/animals and food/feed (particularly Regulation (EC) 1829/2003 - GM food and feed - authorisations and labelling; and Regulations (EC) 1830/2003 - on the traceability and labelling of GMOs, and the traceability of GM food and feed products) and potential changes to these regulations via the proposed Statutory Instrument: The Genetically Modified Food and Feed (EU Exit) Regulations 2018. However, other regulations are also relevant, including regulations covering general food law, novel foods and pesticides (particularly in relation to herbicide-tolerant GM crops, which are blanket-sprayed with weedkillers and often contain high herbicide residues as a result).

### **Q1: Do you have any comments on the proposed approach to fixing inoperabilities in the retained EU Law for day one of Exit from the EU as set out in this consultation?**

GeneWatch UK shares the concerns of the public (as reported in Annex B to the consultation) that Brexit may negatively affect food safety. We also share widely-reported concerns that the use of statutory powers in the European Union (Withdrawal) Act 2018 amounts to adopting 'Henry VIII powers' for ministers with inadequate consultation with the UK and devolved parliaments. It is therefore of the utmost importance that the proposed Statutory Instruments are not used to weaken the proposed regulatory regime.

We therefore wish to **emphasise the importance of retaining EU legal requirements for the risk assessment, traceability and labelling of GM food and feed**. In particular, any move to remove requirements to label GM food would impact negatively on consumer trust.

We note that Brexit nevertheless provides an opportunity to strengthen the risk assessment process for GM foods and associated chemicals, whilst also increasing public engagement and oversight, including greater input from NGOs. UK food products will be able to compete on a global market only by ensuring high quality (including high food safety, environmental and animal welfare standards) and a 'clean, green' brand.

We therefore recommend the following changes:

- A new requirement to label meat and dairy products produced using GM animal feed;
- A more transparent risk assessment and risk management process for GM crops and associated herbicides, with greater recognition of unknowns and uncertainties and more opportunities for input from members of the public and NGOs.

FSA-funded research has previously identified a "strong feeling" that consumers have a "right to know" if GM feed is used in any animal food products<sup>1</sup>.

### **GeneWatch UK**

86 Dedworth Road, Windsor, Berkshire, SL4 5AY, UK

Phone: +44 (0)330 0010507

Email: [mail@genewatch.org](mailto:mail@genewatch.org) Website: [www.genewatch.org](http://www.genewatch.org)

Registered in England and Wales Company Number 3556885

## References

---

<sup>1</sup> GM Labelling: Exploring public responses to the labelling of GM food and the use of GM-free Labelling. Qualitative and Quantitative Findings. Social Science Research Unit, Food Standards Agency. January 2013. Unit Report 17 (page 71). [https://www.food.gov.uk/sites/default/files/media/document/792-1-1401\\_1893\\_FSA\\_GM\\_Labelling\\_Report\\_Webversion.pdf](https://www.food.gov.uk/sites/default/files/media/document/792-1-1401_1893_FSA_GM_Labelling_Report_Webversion.pdf)