

GeneWatch UK response to FSA/FSS consultations on the market authorisation of 3 GM crops for food/feed

February 2025

The following response was submitted to consultations held by the Food Standards Agency (FSA)¹ and Food Standards Scotland (FSS).² According to the consultation pack³, 3 GM crops are being considered for new authorisations for import for use in food and feed (not for cultivation).

Annex 6: RP1123 – GMB151 (new authorisation) (Genetically Modified Organisms (GMOs) for food and feed uses)

Annex 7: RP1232 - GHB811 Cotton (new authorisation) (Genetically Modified Organisms (GMOs) for food and feed uses)

Annex 8: RP1506 - Genetically Modified maize DP4114 x MON 810 x MIR604 x NK603 and sub-combinations (new authorisation)(Genetically Modified Organisms (GMOs) for food and feed uses)

GeneWatch UK responses to questions asked in this consultation:

1a) Do you have any concerns about the safety of the application with respect to the intended consumers?

Yes. The risk assessments for the 3 GM crops do not take sufficient account of the risks of genetically modifying these crops to be herbicide-tolerant. This includes the impact of pesticide residues on human health. All 3 products are genetically engineered to be herbicide tolerant, which means they will be blanket sprayed with the associated weedkillers, posing risks to human and animal health and the environment. These risks increase further as weeds inevitably develop resistance to such blanket spraying and more herbicides are used. High residues of the associated weedkillers are to be expected in food/feed, posing risks to consumers. The presence of herbicide resistant traits also poses risks in the event of accidental release into the environment. Further information is available in GeneWatch UK's report 'Time for the end of GM/GE herbicide tolerant crops?', available on: <http://www.genewatch.org/uploads/f03c6d66a9b354535738483c1c3d49e4/ht-report-fin.pdf>

BASF's GMB151 soybean has been genetically modified to be tolerant to HPPD (4-hydroxyphenylpyruvate dioxygenase) inhibitor herbicides such as isoxaflutole, as well as containing the Bt (insect resistance) trait. BASF's GHB811 cotton has been genetically modified to be tolerant to two herbicides: glyphosate and HPPD inhibitors (and, as noted in the risk assessment, cotton seed can be used in feed meal or processed into oil). Corteva's genetically modified DP4114xMON810xMIR604xNK603 maize has been obtained by traditional crossing of genetically modified DP4114, MON810, MIR604 and NK603 maize, which include herbicide tolerance to glyphosate and glufosinate-ammonium herbicides, as well as Bt traits.

1b) Do you have any comments or concerns on the impacts of authorising or not authorising the application and, if in favour of authorisation, the terms on which the application is authorised (as outlined in the FSA risk management recommendations)?

Yes (as above).

1c) Are there any other factors that should be considered by ministers that have not already been highlighted?

Yes. Herbicide-tolerant crops also pose risks to the environment. Further information is available in GeneWatch UK's report 'Time for the end of GM/GE herbicide tolerant crops?', available on: <http://www.genewatch.org/uploads/f03c6d66a9b354535738483c1c3d49e4/ht-report-fin.pdf>

1d) Do you have any other feedback? Including consideration of any relevant provisions of assimilated law and other legitimate factors (other evidence further supporting clear, rational and justifiable risk analysis, such as consumer interests, technical feasibility and environmental factors).

For further information see GeneWatch UK's report 'Time for the end of GM/GE herbicide tolerant crops?', available on:
<http://www.genewatch.org/uploads/f03c6d66a9b354535738483c1c3d49e4/ht-report-fin.pdf>

¹ <https://www.food.gov.uk/news-alerts/consultations/consultation-on-market-authorisation-of-10-regulated-food-and-feed-products-december-2024>

² <https://consult.foodstandards.gov.scot/regulatory-policy/regulatory-policy-tranche4-wave1-miscellaneous/>

³ <https://www.food.gov.uk/our-work/consultation-pack-on-market-authorisation-of-10-regulated-food-and-feed-products-december-2024>