



CAFOD Submission to DEFRA Consultation on Plant Varieties and Seeds Framework for Precision Bred Plant Varieties

CAFOD is the official aid agency for the Catholic Church in England and Wales; part of the global Caritas confederation of national organisations. CAFOD partners with diverse local NGOs, including both faith-based groups and others working on development issues, including food systems transformation, regardless of religion or culture.

CAFOD is choosing to respond to the consultation on the Plant Varieties and Seeds Framework for Precision Bred Plant Varieties by email, rather than through the online questionnaire, because the questions are directed primarily towards businesses, leaving no opportunity within the questionnaire to raise wider issues beyond those of costs to conventional agriculture businesses. However, CAFOD is concerned that the introduction of precision-bred organisms (PBOs) into the UK seed market without labelling will have significant consequences for others, including small-scale farmers in developing countries, who produce the majority of food in those countries, and are vital to ensuring food security in rural communities.

Diverse plant species enhance resilience, reduce vulnerability to pests and diseases, and improve soil fertility. Access to diverse seeds is therefore key to addressing some of the world's biggest challenges, including responding to the climate crisis, addressing biodiversity loss and building a green economy. As a signatory to the UN Declaration on the Rights of Peasants (UNDROP), the UK has committed to upholding farmers' rights, including the right to seeds.

Additionally, the UK remains committed to multilateral biodiversity efforts such as advancing the Convention on Biological Diversity (CBD), and recognises the importance of farmers' rights under the International Treaty on Plant Genetic Resources for Food and Agriculture (ITPGRFA), the United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas (UNDROP) and Sustainable Development Goal 2.5.

The introduction of PBOs into the UK seed market without clear labelling undermines these international commitments by making it extremely difficult for farmers to choose what seeds they use. If seeds are not labelled, all choice not to use PBOs will be removed from farmers, not only in the UK, but also in countries with limited resources for seed regulation and management. Removing farmers' choice is in direct contravention of farmers' rights as understood in the ITPGRFA, CBD and UNDROP.

Failure to label PBOs in the UK market could have implications for trade. Without clear labelling, seed producers and growers may not be able to guarantee that their produce is PBO-free and may lose access to markets where genetic modification is banned. It puts responsibility for ensuring PBOs are kept out of supply chains onto those who do not want to use them, thus increasing costs for organic and agroecological farmers. It will also become harder for trading partners to trace PB propagating materials, including seeds, or the products grown from PB propagating materials, to choose not to import them. This could lead to PBOs inadvertently entering countries with limited resources to adequately regulate supply chains.

Finally, we challenge some of the assumptions underpinning the framing of the consultation. The questions focus only on the potential impacts to business of labelling PBOs, without raising any questions about the human and environmental impacts of non-labelling. The questions also focus only on plant breeders' rights and do not even reference farmers' rights. This is an egregious omission, given the UK's international commitments to uphold farmers' rights.

Labelling of PBOs should be a minimum requirement, alongside a publicly accessible and easy to use register of PBOs so that farmers, consumers and non-UK growers can make informed choices about the varieties they use.