March 17, 2021

Consultation Coordinator
2nd Floor
Foss House
Kings Pool
1-2 Peasholme Green
York
YO1 7PX

RE: DEFRA Consultation on the Regulation of Genetic Technologies

The Biotechnology Innovation Organization (BIO) welcomes the United Kingdom's (UK) consultation on the application of genome editing in the breeding of plants and animals. The UK has the unique opportunity to be the first country within Europe to establish a path forward for genome editing technologies, establishing the UK as a regional and global leader in this technology, and providing farmers in England new powerful tools to enable agriculture to be a solution to the ever-growing threat of climate change.

BIO is the world's largest life sciences trade association representing nearly 1,000 biotechnology companies, academic institutions, state biotechnology centers and related organizations across the United States and in more than 30 other nations. BIO members are involved in the research and development of innovative biotechnology products that are helping to address society's most pressing challenges, such as the rapid development of COVID-19 vaccines and therapies, and sustainable agricultural production.

For over two decades, the products of agricultural biotechnology have been commercially available and widely used by a growing number of farmers around the world. In the United States, more than 90 percent of corn, cotton, canola, papaya, soybean, and sugar beet seeds planted contain at least one biotechnology-derived trait. Farmers use these products because they enable the production of more food and feed on fewer acres using less energy and reduced pesticide applications.

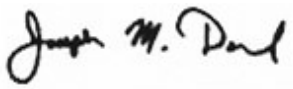
As noted in the 7 January 2021 press release announcing the consultation, genome editing has the potential to unlock substantial benefits to our planet, our health and our food system, such as disease resistant animals, crops that require less water and nutrients and food that is more nutritious. Regarding regulation of genome editing in agriculture, BIO encourages the UK to consider the approaches of other governments within the Americas, Australia and Japan. The UK should aim to achieve similar outcomes to minimize the potential for an asynchronous regulatory

environment that would slow research and development and create unnecessary barriers. Fundamentally, regulation of any organisms produced with genetic techniques, such as genome editing, should be risk-based and proportionate. The safety of the product relative to benchmarks such as safety of comparable existing products should be the endpoint regardless of the technology used.

As demonstrated by approaches taken by these governments, it is evident that genome editing tools provide a greater level of precision. Further, many applications of genome editing result in traits that could have been created using conventional breeding techniques, and in such cases, the regulatory approach should be no more burdensome than required for products produced through conventional breeding methods.

Finally, as the UK considers broad reform of legislation with respect to GM technology, BIO urges the UK to join with key trading partners to chart a path forward where science and technology can be fully leveraged to confront climate change and enable the sustainable production of food globally, particularly in regions of the world most susceptible to the environmental and economic threats posed by climate change. As the policy environment develops, BIO and its members are eager to be a resource to help the UK government advance its innovation and sustainability goals.

Sincerely,



Joseph M. Damond
Executive Vice President, International Affairs