

Genetic Technology (Precision Breeding) Bill Written Evidence from Crustacean Compassion

Crustacean Compassion welcomes the opportunity to comment on the Genetic Technology (Precision Breeding) Bill before it is scrutinised at Committee Stage. While our comments here are narrowly focussed on the definition of animal in Clause 10 – we also support the submission made on behalf of the Better Deal for Animals Coalition.

The current definition of “relevant animal” in the Bill, for the purposes of precision bred animal marketing authorisations only covers vertebrate animals - with provisions within the Bill to extend this by regulation if the definition of animal under the Animal Welfare Act 2006 changes.

We believe that to ensure the best possible protections for animal welfare, a more comprehensive definition of animal is needed. We suggest the definition contained in the Animal Welfare (Sentience) Act 2022 would be appropriate, covering all vertebrate animals but also cephalopod molluscs and decapod crustaceans.

The Sentience Act is a landmark piece of legislation and is the first time that decapod crustaceans (and cephalopod molluscs) have been recognised as sentient in UK law. Decapod crustaceans were included in the Sentience Act following a robust review of scientific evidence – laid out in a report by the London School of Economics and Political Science¹.

The ‘Central Recommendation’ of the report (page 8) states “We recommend that all cephalopod molluscs and decapod crustaceans be regarded as sentient animals for the purposes of UK animal welfare law. They should be counted as “animals” for the purposes of the Animal Welfare Act 2006 and included in the scope of any future legislation relating to animal sentience”.

Given that this is the first piece of legislation relating to animals to be published by the government since the passage of the Sentience Act, we believe that animal sentience must be the condition for the inclusion of animals within this Bill.

As the Genetic Technology Bill is currently drafted, there are limited protections for animals recognised as sentient but not yet covered under the Animal Welfare Act, namely decapod crustaceans and cephalopod molluscs.

Because decapod crustaceans are not currently a regulated animal under the Animals (Scientific Procedures) Act 1986 – the scale of their use in scientific experiments is unknown. However, including them in the scope of this Bill from the start would provide safeguards for the future, which is important given the current pace of development of genetic technology.

Given that any future evidence for sentience of other species will likely lead to their inclusion in the Animal Welfare (Sentience) Act prior to their inclusion in the Animal Welfare Act – there is likely to be a lengthy delay between the legal recognition of sentience and being inclusions in the Genetic Technology Bill while necessary secondary legislation is introduced.

We hope that the Committee will consider amending the definition of ‘relevant animal’ in Clause 10 to provide further protections.

¹ [Review of the Evidence of Sentience in Cephalopod Molluscs and Decapod Crustaceans](#)