

GMO Policy

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For Stakeholder
Consultation

Preferred
by Nature
Certification



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Policy statement

Preferred by Nature (PBN) applies a risk-based approach to the use of Genetically Modified Organisms (GMOs) in its certification programme.

This policy emphasises transparency, the Precautionary Principle, and alignment with PBN's sustainability mission. PBN recognises that GMOs can, depending on the context, either contribute to or undermine sustainability goals. Therefore, we strive to permit innovations that clearly support sustainability under strict conditions, while proactively excluding high-risk or harmful GMO applications.

This policy must be used in conjunction with other normative documents in the PBN Certification programme. See **Box 1**.

Box 1.

Normative Documents for Preferred by Nature Certification

PBN-01. Sustainability Framework

Establishes the principles, criteria, and indicators that land-use managers must follow to demonstrate responsible, sustainable practices, as well as social requirements for supply chain entities.

PBN-02. System Standard

Sets out generic quality system requirements applicable to all Preferred by Nature certified operations.

PBN-03. Due Diligence Standard

Defines requirements for supplier collaboration, supply chain information, risk assessment, and mitigation for due diligence and includes a EUDR specific annex.

PBN-04. Seal Use Standard

Sets requirements and conditions for using the PBN Seal.

PBN-05. Chain of Custody Standard

Specifies requirements for chain of custody models and traceability systems used to manage claims and track products throughout the supply chain.

PBN-06. Terms and Definitions

Provides definitions and concepts used in the Preferred by Nature Certification programme.

PBN-07. Pesticides Policy

Defines PBN's policy on the use of pesticides.

PBN-08. GMO Policy

Defines PBN's policy on the use of Genetically Modified Organisms (GMOs).

Scope and applicability

This procedure applies to Preferred by Nature Certification (PBNC) certificate holders across **all land use sectors** (forestry and agriculture). It covers the process by which Preferred by Nature (PBN) screens, evaluates, and determines the acceptability of GMO use in operations seeking certification under the PBN Sustainability Framework.

Both new PBNC applicants and existing PBNC certificate holders introducing GMOs into their operations are subject to this procedure (treated prospectively as new scope additions).

The requirements for certificate holders regarding GMO usage are set out in **PBN's Sustainability Framework** under Criterion 3.10 (Use of Genetically Modified Organisms) and its indicators. This procedure describes the process for PBN to control the use of GMOs and to control and evaluate conformance with the applicable requirements in the Sustainability Framework. For other schemes against which PBN certifies, the applicable GMO rules of those schemes will be followed.

PBN's GMO policy applies to organisations that actively cultivate GMO crops, not to farmers whose land may inadvertently contain GMO varieties due to unintentional spread.

Note: Auditor guidance for verifying GMO-related criteria is provided separately in the PBNC Auditor Handbook and is not covered in this document.

Conditions for Certificate Holders regarding GMO use

PBN will permit the active use of GMOs within a certified operation **only if all of the following conditions are met**.

- **Legal Authorisation**
The GMO must be legally permitted in the jurisdiction(s) where it is used. All required biosafety permits, regulatory approvals, and registrations must be valid and available for review.
- **Transparent Disclosure**
The certificate holder must fully disclose all GMO use during the certification application and throughout the certification period. This includes:
 - The GMO's organism and trait(s)
 - Purpose of use (e.g., cultivation, ingredient, processing aid)
 - Country of use
 - Relevant risk assessments, legal authorizations, or sustainability claims
- **Conformance with (PBN-01) Sustainability Framework requirements**
All normative indicators under Criterion 3.10 of the PBN Sustainability Framework must be met.

Conditions for inclusion on the PBN GMO Whitelist

The PBN GMO Whitelist is a centralised list of GMOs that have been pre-approved for use under certification. GMOs included on the Whitelist do not require repeated risk evaluations during certification, provided that all applicant-level preconditions are fulfilled.

To qualify for inclusion on the Whitelist, a GMO must meet the following criteria:

No critical environmental red flags	The GMO must not pose significant environmental risks. Its use shall be demonstrated as not leading to biodiversity loss, habitat degradation, or an increase in hazardous chemical use beyond acceptable thresholds. GMOs known to cause ecological harm — for example, through invasive behaviour or by fostering dependence on heavy pesticide use — will be excluded. Preferably, the GMO contributes positively to environmental outcomes, such as reducing chemical inputs or enhancing climate resilience. At a minimum, it shall not result in greater impacts than conventional alternatives.
No critical social red flags	The GMO must not have adverse social consequences. It shall not contribute to violations of traditional or Indigenous rights, nor create dependency for farmers or communities (for example, through restrictions on seed saving or excessive input costs). Evidence of significant public opposition, or indications that the GMO undermines livelihoods or food sovereignty, will be treated as a red flag and may result in non-approval.
Demonstrated sustainability rationale	<p>There must be a clear sustainability benefit or rationale associated with the GMO. Its use shall demonstrably contribute to environmental or social goals beyond what conventional alternatives provide.</p> <p>Examples of acceptable benefits include reduced input requirements (for example, lower pesticide or water use), enhanced climate adaptation (such as drought tolerance), or improved nutrition (for instance, through biofortification).</p> <p>GMOs that lack a measurable sustainability benefit — or that are used primarily for commercial yield gains without wider environmental or social value — may not be approved. Yield or productivity gains may be recognised as a valid sustainability rationale only where credible evidence demonstrates that such gains reduce external pressures (e.g. land expansion or resource use per unit of output) and do not create new environmental or social risks.</p>
Risk assessment and mitigation	The GMO must have undergone a credible risk assessment conducted by regulators, independent bodies, or recognised

	<p>scientific institutions. Where approved for use, it shall be subject to appropriate risk mitigation measures.</p> <p>This includes identifying potential impacts — for example, on ecosystems, human health, or socio-economic systems — and implementing suitable controls such as monitoring, buffer zones, or emergency response mechanisms.</p> <p>If no effective mitigation is possible for a known or likely risk, the GMO will not be accepted for certification.</p>
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If any of the above conditions are not satisfied, the use of the GMO is not permissible under PBN certification and cannot be included in the PBN GMO Whitelist.

Screening and evaluation process

When a certification applicant declares the use of GMOs within the certification scope, the following process shall be applied. The objective is to ensure that GMO use is transparently disclosed, consistently evaluated against PBN’s criteria, and — where appropriate — approved for certification.

A central element of this process is the PBN GMO Whitelist, which enables generic approvals of GMOs that meet predefined sustainability and risk requirements.



Step 1: Applicant disclosure

All certification applicants shall declare whether they use GMOs — in production, processing, or supply chains. This disclosure includes identifying each GMO in use and providing key information such as:

- The organism and trait
- The purpose of use
- Any documentation on legal status, approvals, and claimed sustainability benefits



Step 2: Screening by PBN

PBNC staff review the GMO disclosure to:

- Check if the GMO is already on the PBN GMO Whitelist.
- If not, continue screening:
 - Confirm legal compliance in the jurisdiction(s) of use
 - Check for immediate “red flag” traits or practices (e.g., GMOs promoting ecosystem degradation, lacking transparency, or banned locally)

If a disclosed GMO clearly violates PBN’s exclusion criteria or lacks legal approval, the applicant is informed that certification cannot proceed with the GMO in scope.

If the GMO is already on the PBN GMO Whitelist, and no site-specific concerns are identified, it is approved automatically without further evaluation.



Step 3: Evaluation of new GMOs

If the disclosed GMO is not yet on the Whitelist, PBN conducts a structured evaluation to assess:

- Legal status and regulatory approval
- Potential environmental or social risks
- Sustainability contribution (e.g., soil health, food security)
- Transparency and traceability practices

If the GMO meets all permissibility conditions (see Section 2), and no significant risks are found, PBN may approve it for certification and recommend its addition to the Whitelist for future use. The Whitelist will be available publicly on PBN's website.



Step 4: Expert review (If needed)

In cases where risks or impacts are unclear, the GMO case is escalated to the **PBNC Programme Manager** or designated technical advisors. The reviewers may consult additional data or request clarifications from the applicant. The reviewers determine whether the GMO can be used under PBNC or whether it must be excluded due to unresolved risks.



Step 5: Final decision

PBN makes a formal decision on the GMO's status based on the findings of the evaluation and any expert input. Outcomes include:

✓ **Accepted:** The GMO is approved for certification and may be added to the PBN Whitelist (if not included already).

✗ **Rejected:** The GMO is not approved for certification due to legal issues or failure to meet PBN's sustainability thresholds.

Final decisions on whether to add a GMO to the Whitelist are made by the PBN Certification Steering Committee.



Step 6: Documentation and communication

All GMO-related decisions are documented in PBN's internal systems and noted in the certificate scope. Where applicable, stakeholders may be informed — on request or via public summaries — that GMO use has been evaluated and approved under this policy. Information about GMO use is available in the public summaries of audit reports.

The certificate holder is provided with written confirmation and any applicable conditions tied to GMO use.

Preferred by Nature is an international non-profit organisation working to support better land management and business practices that benefit people, nature and the climate. We do this through a unique combination of sustainability certification services, projects supporting awareness raising, and capacity building.

For 30 years, we have worked to develop practical solutions to drive positive impacts in production landscapes and supply chains in 100+ countries. We focus on land use, primarily through forest, agriculture and climate impact commodities, and related sectors such as tourism and conservation.

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