

Gene technology review submission

From organic grain milling company Kialla Pure Foods on behalf of the company and its organic suppliers.

The purpose of this submission is to identify issues and opportunities for improvement to ensure new technologies are regulated according to the risks they pose.

Current Australian national organic standards require zero residue of GMO in all organic produce. In our most significant export markets the requirement is also zero. Any regulation of new genetic technologies must be in accordance with regulations in our export markets, but particularly Asian markets since these are Australia's largest export markets for organic grains.

Organic grains sell for a premium both nationally and internationally over the conventional market value of grain, including the market for GMO grains. Australia's organic products represent premium market opportunities particularly in Asian countries that already purchase Australian organic grains.

With zero tolerance as the organic export standard (see references below), Australian organic producers must be able to ensure zero residue in Australian organic products in order to remain viable in these premium export markets.

Therefore we emphasise the importance of protecting existing export markets, and potential new markets particularly in Asia, by following the guidelines and regulations around current and new technologies that these countries have in place.

This is a simple necessity in order to protect organic businesses, and in particular farmers, and handlers or processors of organic grains and produce that are exported.

Thus maintenance of this premium market is an absolute necessity for the organic industry, particularly for those like Kialla Pure Foods exporting into the Asian market. The value add for organic must not be jeopardised in anyway by any softening of regulation around the use and sale of genetically modified grain crops, including any crops produced using new bio-technologies.

New regulation must sufficiently protect those choosing to farm or process non-GMO grains, including protection against losses or costs incurred to farmers due to genetic flow in grains.

Currently general risk management of genetic flow falls on farmers and handlers, with organic processors like Kialla Pure Foods bearing the costs to test for residue or contamination.

The regulation must ensure that onus should not fall on organic farmers to manage risks of contamination. The reality is that an organic farmer, who might have a neighbour growing GMO crops, will be the one who bears the burden of dealing with issues that arise when contamination occurs.

We all have the right to choose, however the law needs to be sufficient in cases where the choice of others has significant consequences on the livelihood of those who did not make that same choice, but could potentially be adversely affected by it.

The organic industry must not have to carry the burden of risk management for GMO farmers and the GMO industry in general.

Furthermore, we emphasise the importance of future regulation to return liability to proprietary owners of genetically modified organisms, and to have provision for recourse for organic producers in any cases of loss incurred through cross-contamination of their organic crops with genetically modified crops.

See: <http://www.agriculture.gov.au/SiteCollectionDocuments/aqis/exporting/food/organic/national-standard-edition-3-7.pdf> (pg 15-16)

As an example of Asian organic standards - Japanese organic standard:
http://www.maff.go.jp/e/policies/standard/jas/specific/criteria_o.html

