

28 September 2017

Submission to the Gene Technology Legislative Review
The University of Queensland IBC

General comments

- Aligning regulatory schemes to avoid duplication is recommended e.g. Standardise transport labelling between OGTR/TGA/ etc. to assist license holders with compliance and safety, update guidelines as well as this review of the legislation.
- OGTR should tap into the resources and knowledge of industry partners in reviews.
- GMAC transition piece should be removed from the legislation.
- Application forms and processes should take advantage of technological improvements e.g. electronic submission and tracking of applications for both dealings and facilities. This will allow for easier variation of application forms to match the variation in work being conducted throughout Australia and flexibility to move with new technologies as they become used.
- Consideration with NLRDs when advising/reporting to the regulator, which NLRDs are active and which ones have ceased. This will remove confusion with work that is re-assessed by the IBC (extended but new number) where it looks like multiple NLRD numbers have been given to the same work even though only the latest one NLRD is active.

Specific comments on Gene techniques and reporting

- Any new gene technology regulatory scheme needs to allow for rapidly changing technologies, as well as providing consistent provisions for existing methodologies.
- CRISPR and CRISPR like technology that has the capacity to produce GMOs that are identical to the parental strain, naturally occurring variants or those produced by traditional breeding techniques may need to be considered differently depending on either the stage in the genetic modification process or the location where the modification occurs e.g. while making the initial modification the work would be classified as GM; whereas once all modifications are complete and all traces of modification machinery (i.e. CRISPR/Cas9 RNA systems) are not present, the organism could be considered “released from Gene Technology regulation” and would be treated the same as a parent/control/traditionally bred strain.

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