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**Gene Technology Review Team**

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**PGA Submission to the Review of the Gene Technology Act 2000**

The Pastoralists & Graziers Association of WA (PGA) is a non-profit industry organisation established in 1907, which represents primary producers in both the pastoral and agricultural regions in Western Australia. Members include pastoral leaseholders and freehold farmers through the full spectrum of some of Australia's largest corporate pastoral groups to family-owned companies and trusts and individual landholders in Western Australia.

The PGA's core and guiding principles are self-reliance, subsidiarity, property rights, free markets, competition, small government and reduced regulations.

The PGA acknowledges the current Gene Technology regulatory framework is among one of the most robust in the world. The framework's emphasis to science based regulatory controls is commendable. As the biotechnology field is rapidly advancing it has become apparent that the current scheme is in some cases cumbersome, with an inability to deal effectively with new and emerging technologies whilst at the same time over regulating long established technologies that have a robust safety record.

With respect to the ongoing review to the review of the *Gene Technology Act 2000* the PGA considers the following matters imperative when developing any future regulatory regime for gene technology in Australia:

1. The regulatory framework accurately reflects the real risk (not perceived) of a particular technology
2. The regulatory framework continues to remain science and evidence driven
3. The framework is agile so that it is able to keep pace with the development of new technology and does not place an undue regulatory burden on proponents

The PGA considers it of the utmost importance that a gene technology regulatory framework does not place undue burden upon the plant science industry. With the Western Australian agricultural industry being characterised by highly variable environmental conditions, combined with an increasingly competitive international market conditions, it is vitally important that plant breeders are able to access a wide range of technology that enables the development of products tailored to environmental or market conditions. Having ready access to a wide range of genetic engineering techniques is essential to achieving this goal.

The PGA supports a hybrid regulatory system that considers both product and processes when determining the level of assessment required prior to a particular genetic technology being released. A hybrid approach will enable the most effective level of risk tailoring as it acknowledges both the pathway to achieve a result, as well as the end use. This is essential as different processes clearly pose differing levels of real and perceived risk in addition to varying ethical considerations depending on the product that is utilising the technology. For example certain genetic engineering techniques that may be relatively low risk may require more in-depth ethical consideration if they are going to be utilised in a medical product, as opposed to a plant health application.

With regard to other regulatory regimes, the PGA considers it imperative that the Australian regulatory framework pursue an agenda of international harmonisation or equivalency of regulatory requirements. This would enable the Australian regulatory framework to be able to consider assessments made by international regulators who operate under standards commensurate with the Australian Gene Technology regulatory regime. This will significantly reduce duplication, costs and ultimately product pipelines for new gene technology, hence enabling plant breeders and producers quicker access to new products.