



Submission to:

Review of the National Gene Technology Scheme 2017

Consultation Paper: Overarching Issues for consideration under  
the Review

**Prepared by:** Maddison McNeil  
**Organisation:** Western Australian Farmers Federation  
Grains Section  
**President:** Duncan Young  
**Postal Address:** PO Box 556  
Belmont WA 6984  
**Phone:** (08) 9486 2100  
**Contact name:** Maddison McNeil  
**Title:** Executive Officer  
**Email:** [maddisonmcneil@wafarmers.org.au](mailto:maddisonmcneil@wafarmers.org.au)

## **Introduction**

The review of the national gene technology regulatory scheme is timely given the continual development of new technologies that are beyond the scope of current regulations.

WAFarmers supports the current regulatory scheme, and does not think that the regime needs to make significant changes to meet the challenges of regulating gene technology into the future. The current regime is science-based, and efficient and effective in how it regulates industry. The regime requires an adjustment in policy setting mechanisms to allow the Office of Gene Technology Regulator (OGTR) flexibility to regulate gene technology, without requirements for legislative changes.

The capacity for future proofing the scheme is to allow the regulations to remain broad and allowing policy to define gene technology, including use of exclusion lists. However there must be mechanisms for 'excluded' technologies or organisms to be reviewed. It would ensure that regulations accurately reflect a science and risk-based approach. Information and technology is continually evolving, therefore mechanisms to reassess technology based on new information is essential for effective regulation.

WAFarmers endorses the National Farmers Federation submission, and offers the following comments in addition to their contribution.

## **Theme One – Technical Issues**

Technology in the short and medium term is known, whereas the long term is unclear as new techniques are evolving rapidly, and are likely to redefine gene technology in the future. The most logical regulation of the technology is to regulate for the known technology, while allowing a risk-based and science-based policy setting framework to determine the requirements for the future.

Classification of new technologies on an exclusion list, with allowances for reassessment, is the most realistic option for regulating the technologies.

The distinction between gene editing and technologies that introduce foreign DNA must be made clearly. Manipulation of cells processes to influence change, compared to introduction of foreign DNA are different technologies, and therefore should be regulated as such. The capacity to distinguish between products of gene editing compared to conventional breeding methods is not currently possible. Regulating a technique that poses similar risks to conventional, non-GM breeding methods is not an appropriate use of the regulation.

## **Theme Two – Regulatory Issues**

The regulation of gene technology in Australia is process-based, whereas other countries utilise a product-based regulation. The gene technology is regulated or excluded from the regulations, and then the product is assessed on the risks posed to the health and safety of the environment and people.

The flexibility for OGTR to regulate gene technology and genetically modified organisms on either a process or product based approach, in accordance to the risks and scientific evidence, is the only approach that should be considered.

## **Theme Three – Governance Issues**

The multiple levels of government within Australia, specifically Federal and State governments, and the different political agendas and conflict between parties are likely to cause tension. This is both within the regulations, as well as within the community. Gene technology and its regulation remains a Federal issue, however it has a broad reaching social impact, and a nationally consistent position on GM would be a significant benefit for both the scientific and farming industries.

The current regulatory regime effectively manages the issues with policy agendas, while also allowing the States flexibility to regulate gene technology in their state.

The current regulatory scheme has the appropriate principles for the regulation of gene technology. The changes required need to reflect the new technologies, and clarify any inconsistencies in the science and risk-based approach that is currently regulated.

## **Theme Four – Social and Ethical Issues**

There is a role for Government to address some common misconception on gene technology, however given the nature and the level of scientific knowledge required to understand the issue, it is unlikely that widespread concerns of society will be clarified.

The OGTR is well respected by the community; however there is a very limited understanding of the role that OGTR play in regulation. There is a significant amount of information available on the websites of OGTR and Food Standards Australia New Zealand (FSANZ), however only those with an interest in knowing more are likely to search the websites for information.

## **Organisational Background**

The Western Australian Farmers Federation (Inc.) (WAFarmers) is the state's largest and most influential rural advocacy and service organisation. WAFarmers boasts a membership of over 3,500 primary production businesses and individual farmers including grain growers, meat and wool producers, horticulturalists, dairy farmers, commercial egg producers and beekeepers. Collectively our members are major contributors to the \$7.5 billion gross value of production that agriculture in its various forms contributes annually to Western Australia's economy. Additionally, through differing forms of land tenure, our members own, control and capably manage many millions of hectares of the state's land mass and as such are responsible for maintaining the productive capacity and environmental wellbeing of that land and the animals that graze it.

WAFarmers is also a proud member of the National Farmers' Federation (NFF), ensuring that the voice of WA farmers is heard at the national level. The NFF is the peak national body representing farmers and, more broadly, agriculture across Australia. It is one of Australia's foremost and respected advocacy organisations, proactively representing farm interests and asserting policy positions to governments and the broader community.