

Comments on Act: May 30th 2011

1. Expansion of Act/Regulations to acknowledge the potential impact of GMOs to humans and to the environment at the global level and include regulatory controls/requirements, which address national and global risks of all GMO activities within Australia.
2. Expansion of definition for “environment” to include potential impact of GMOs at the global level.
3. Inclusion in the Act/Agreement reference to a National Ethics Framework with sufficient powers to enforce compliance (eg. inclusion in *Australian Code for Responsible Conduct in Research*, which is enforceable by institutions).
4. Need to develop principles/guidelines within the Act/Regulations, which ensure that intellectual property rights of GMO developments do not prevent/limit access of scientific developments and knowledge to the Australian community or the international community.
5. Provision for the development of a national, on-line OGTR training course to improve national consistency in regulatory understanding and enforceable compliance by all parties involved in GMO development and/or regulation/monitoring.
6. Provision within the Act/regulations requiring investigators working with any potentially, bio-hazardous materials (eg. viruses, chemicals, toxins; both GMO & non-GMO) to inform institutions and IBCs of their activities to ensure the institution is aware of these activities and there is a mechanism by which they can be referred to the appropriate Committee for review, approval and/or control. (eg. increased coordination, accountability and regulation).