



Department of
**Primary Industries and
Regional Development**

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Enquiries: [REDACTED]

The Legislative and Governance Forum on Gene Technology (LGFGT)
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Dear LGFGT Members

SUBMISSION TO THE 2017 REVIEW OF THE NATIONAL GENE TECHNOLOGY REGULATORY SCHEME

Thank you for the opportunity to make a submission to the 2017 review of the National Gene Technology Regulatory Scheme (the scheme). This submission is based on input from members of the Western Australian (WA) Gene Technology Interdepartmental Committee (GTIDC) and the Department of Primary Industries and Regional Development's (DPIRD's) Institutional Biosafety Committee. These committees include representatives from Department of Health, the Department of Biodiversity, Conservation and Attractions, DPIRD's Agriculture and Food and Fisheries divisions, and the community. The WA Government's Department of Jobs, Tourism, Science and Innovation were also consulted.

It is generally agreed that the scheme has been successful in achieving the object of the *Commonwealth Gene Technology Act 2000*, namely to "protect the health and safety of people, and to protect the environment, by identifying risks posed by or as a result of gene technology, and by managing those risks through regulating certain dealings with Genetically Modified Organisms (GMOs)". In addition, there is little evidence that the national regulatory scheme has hindered innovation in the use of GMOs in Australia, as evidenced by an increase in commercial releases of GM crops and GM vaccines for human and animal use under the scheme.

The committee members also agreed that since the scheme started in 2000 there have been many innovations in gene technology, and suggest that the review focus on investigating and redefining the definition of a GMO in the *Commonwealth Gene Technology Act 2000*.

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This will not be an easy task and must include consideration of gene drives and germline versus somatic modifications. It will be important to engage with stakeholders and the wider community to try and gain agreement on the definition of a GMO in order to help provide assurance that the scheme will continue to effectively manage risks to human health and safety and the environment. Re-definition of a GMO will provide a critical policy setting for the national scheme.

The members were concerned that some entities applying for licences to deal with GMOs chose to use well known environmental and crop weed species as their base species (for example - *Juncea canola* (*Brassica juncea*)). We suggest that the Legislative and Governance Forum on Gene Technology consider changes to the regulatory scheme that would stop proponents inserting herbicide tolerance genes into known environmentally harmful species.

The members also suggest that the Legislative and Governance Forum consider the policy setting for risk assessment of GMOs with stacked traits. The members agreed that any organism with a new inserted gene must go through a complete risk assessment. It does however seem overly onerous to require a full risk assessment on GM varieties that have been bred by conventional crossing of two varieties containing inserted genes that have already been through a complete risk assessment.

The members had a range of opinions on the role of the Office of the Gene Technology Regulator in educating the public on GMOs. Some members thought the Regulator should play more of a role in information provision and extension, while others felt that this was not a role for the Regulator. Either way the review should take this important role into consideration and aim to provide clarity.

Thank you for considering our submission.

Yours sincerely



Ralph Addis
DIRECTOR GENERAL

28 September 2017