

15th December 2017

Gene Technology Review  
Department of Health  
MDP 1060  
GPO Box 9848  
CANBERRA ACT 2601

**Re: 2017 Review of the National Gene Technology Regulatory Scheme**

Grain Trade Australia (GTA) appreciates the opportunity to provide this supplementary submission to the Department of Health's Review of the National Gene Technology Regulatory Scheme. GTA has participated in the second phase consultative workshops and would like to take this opportunity to make some supplementary points. GTA's position is unchanged from its original submission and this letter supports our initial submission and seeks to reinforce or clarify some key points that have been discussed during the recent consultations.

▪ Australia's regulatory system

GTA supports the importance of a functioning regulatory system for gene technology and believes that the Office Gene Technology Regulator (OGTR) and the supporting legislation that is in place in Australia delivers an effective and efficient system. Any changes should only enhance the scheme that is in place and working.

GTA supports the National Gene Technology Regulatory Scheme (Scheme) and believes that it has been effective in providing certainty and confidence to the industry and community in relation to GM crops. GTA also believes that Australia is seen as a model for other parts of the world in terms of its approach and regulatory outcomes. It is critical for the grains industry that there are effectively functioning regulatory systems in the countries with which it trades.

▪ Scope of the regulatory system

GTA supports the current scope of the Scheme i.e. application to human health and environment. We do not support any extension to economic or trade issues. These are commercial issues and the Australian grains industry's market choice approach has provided an effective mechanism to meet domestic and global market requirements. GTA has recently updated the industry's market choice Framework (*Market Choice Framework with GM Crops 2016*).

▪ Scheme framework

GTA supports the principle of providing more flexibility to the regulator (OGTR) to apply the regulation differently based on relative risks. The current scheme has a one size fits all approach, however, there are significant differences in the potential risks to human health and environment depending on the technology and where it is being applied.

GTA believes that focusing the Scheme around principles supported by regulations and guidelines to deal with specific technologies and risks will provide the framework for risk based flexibility in application of the regulation and enable the scheme to keep pace with changes in technologies.

As such, we support a tiered risk approach. This tiered risk approach will be a combination of process and product based risks and triggers.