

## **Email Submission: Joanna Koniuszewski**

I ask you to please consider my following concerns regarding these new techniques:

These techniques pose unknown risks and need to be regulated. Austrian government agencies are among the few globally to consider the biosafety risks posed by new GM techniques. Their conclusion, over three separate, high level reviews of the biosafety risks, is that there is insufficient knowledge regarding the risks posed by these techniques. On this basis, they argue that products derived from new GM techniques should be regulated in the same way as those created using older GM techniques and require a comprehensive case by case risk assessment.

The Norwegian Environment and Development Agencies also recently commissioned a review of these techniques. This concluded that further biosafety research needs to be performed before these techniques are commercialised.

If the OGTR deregulates these new GM techniques there will be no monitoring or surveillance. Anyone from amateur biohackers – to industry – to terror groups would be free to use them to genetically modify plants, animals and microbes. Entirely new diseases and poisons could be made. And they could enter our food chain and our environment with no safety testing and no labelling. The risks could be catastrophic.

Reviews commissioned by the Austrian and Norwegian governments concluded that not enough is known about the risks posed by these new GM techniques. They recommended that products derived from them require comprehensive case-by-case risk assessments.

I urge you to stop letting industry write the rules for regulators and instead to put public health and our environment before private profit.

I call for the following please:

For these new GM techniques and the products derived from them to be subject to a comprehensive case by case risk assessment, including full molecular characterisation and independent safety testing to minimise any potential risks to human health and the environment;

All products derived from new GM techniques to be labelled to protect choice for farmers, producers and consumers;

The precautionary principle to be enshrined in both the Gene Technology Act and the Food Standards Australia New Zealand Act, given the experimental nature of these technologies and the risks associated with them;

The Government to impose strict liability on all dealings with GMOs licensed by the OGTR, so that liability for GM contamination and the resultant losses and costs rests fully on the licensees and the owners of GM patents;

A moratorium on the commercialisation of these new GM techniques until our regulatory system for GMOs is adapted to deal with the potential risks posed by them.