

16 December 2016

Office of the Gene Technology Regulator  
Department of Health  
Via email: [ogtr@health.gov.au](mailto:ogtr@health.gov.au)

### **Re: Discussion Paper – Options for regulating new technologies**

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the *Discussion Paper: Options for regulating new technologies*. The NFF supports the current technical review process based on scientific and technological knowledge and would like to emphasise how crucial it is to be guided by scientific input to create a regulatory environment conducive to innovation in plant breeding.

The NFF is the peak national body representing farmers and, more broadly, agriculture across Australia. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations collectively form the NFF.

#### **The benefits of gene technology for agriculture**

The NFF recognises the potential of gene technology as a valuable tool within agricultural production systems. The responsible and strategic application of gene technology within Australian production systems will result in significant benefits for Australian farmers, the environment, consumers and the Australian economy as a whole.

The NFF supports gene technology research and development and believes that the outcomes of research and development (R&D) can contribute to meeting Australia's future challenges. It is crucial, however, that regulation adequately safeguards against risks posed to human and animal health, and the environment.

Realisation of the potential benefits of gene technology within Australian farming systems is dependent upon a regulatory environment which promotes R&D investment. The ultimate aim of government should be to create an operating environment that encourages public and privately funded research and supports the development of Australian innovation, including in the field of gene technology.

#### **Giving farmers a choice**

The NFF considers that farmers should retain the opportunity to adopt the method of production best suited to their business needs, be that gene technology, conventional, organic, or any combination of those methods. In protecting the integrity of a farmer's decision, it is important that agricultural supply chains consider the implementation of plans to allow all producers to continue to meet the requirements of their chosen markets.

### **Which option/s do you support, and why?**

The NFF rejects Option 1 (No amendment to the current gene technology regulations) and Option 2 (Regulate certain new technologies). If Option 1 was chosen, uncertainty about gene editing would continue. If Option 2 was chosen, all new breeding techniques would need to undergo a rigorous regulation process, making R&D in gene editing expensive and time-consuming.

The guiding principle in determining whether a product should be regulated by the OGTR or not should be whether the modification introduces new genetic material. If the change uses technologies such as gene editing, producing a result that could have occurred in nature, it should not be regulated by OGTR.

The NFF believes that it is critical for the future development of food and fibre to make regulation flexible enough to enable innovation. Consequently, the NFF supports Option 4 (Exclude certain new technologies from regulation on the basis of the outcomes they produce). It is, however, critical that market access and consumer sentiment are not jeopardised. Hence, the NFF does not dismiss Option 3 (regulate some new technologies based on the process used) although Option 4 would be preferred, anticipating a negative impact for industries if gene editing was to be subject to additional red tape.

For further information please contact:

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