



Australian Government
Department of Health
National Industrial Chemicals
Notification and Assessment Scheme

Dr Raj Bhula
Gene Technology Regulator
GPO Box 9848
CANBERRA ACT 2601

Raj
Dear Dr Bhula

Re: Review of the Gene Technology Regulations 2001: Invitation to Comment on Discussion Paper

Thank you for your invitation to make a submission on the current technical review being undertaken of the Gene Technology Regulations 2001.

I note that the review aims to provide clarity as to whether organisms developed using certain new technologies meet the definition of a "genetically modified organism". I also note the secondary aim of the review, which is to ensure that new technologies are regulated in a manner commensurate with the risks they pose.

I have no specific comment on the merits of the options canvassed in the *Discussion paper: Options for regulating new technologies*, other than to note that increased clarity would assist in the consultation between the Director of the National Industrial Chemicals Notification and Assessment Scheme (NICNAS) and the Gene Technology Regulator in respect of an industrial chemical that is, or contains, a GM product.

Increased clarity and risk proportionate regulatory arrangements are also the focus of current reforms to NICNAS, and I would like to take this opportunity to thank you and your staff for your valuable input into these reforms, and look forward to continued dialogue between our organisations.

Yours sincerely

Dr Brian Richards
Executive Director, Office of Chemical Safety
Director, NICNAS

25 November 2016