

16 December 2016



Regulations Review
Office of the Gene Technology Regulator (MDP 54)
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Office of Gene Technology Regulator - Discussion paper: Options for regulating new technologies

On behalf of the Grains Council at the Western Australian Farmers Federation (WAFarmers), we welcome the opportunity to comment on the technical review of the Gene Technology Regulations 2001 discussion paper.

As background, WAFarmers is the state's largest and most influential rural advocacy and service organisation. WAFarmers represents around 3,000 Western Australian farmers from primary industries, with the majority being grain growers. As the largest WA rural advocacy group, our members are responsible for approximately 35 per cent of the overall grain production in WA.

WAFarmers supports Option 4: *exclude certain new technologies from regulation on the basis of the outcomes they produce*. The discussion paper clearly outlines how previous regulatory decisions have been made, and therefore Option 4 is the most in line with previous regulatory decisions.

Option 4 is also the most logical option, as it provides clear regulatory scope for future technologies. The key consideration is the makeup of the organism and, therefore, if the technology provides the same outcome that would be provided by nature, it should not be considered genetically modified.

The current rate of development of new breeding and gene technologies is no longer matched by the current regulatory system, and therefore a clear regulatory decision is essential. Without it, Australian farmers will likely miss out on the technology, and any potential productivity gains or genetic improvement.

WAFarmers supports the right for farmers to farm as they choose, and clear decisions on classifications of gene technology will further enhance their understanding.

The adoption of Option 4 is likely to improve market access, minimise regulatory burden for plant breeders, and provide a more reliable regulatory environment for the agriculture sector.

WAFarmers thanks the Office of Gene Technology Regulation for their review of the next generation of technologies, and we welcome a clear outcome from the review, for the benefit of agriculture.

Yours sincerely,

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Grains Section President