

Submission to OGTR on suggested changes to the regulation of gene technology.

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It is totally irresponsible to suggest deregulating new any gene technology, let alone a very new technology such as CRISPR. Already it is clear that CRISPR is nothing like as precise as claimed – in fact this claim has been made for every gene technology and proven wrong every time so far. Although there are already claims that the precision of CRISPR can be improved, it is grossly premature to accept this as proven and drop the requirement for testing. It is abundantly clear that these new technologies have not been adequately tested, and in fact none of your GM releases have ever been adequately (or even minimally) tested for unexpected effects.

The argument that many GM like mutations occur in nature, is and always has been a red herring. This argument is specially offensive when run by big companies like Monsanto, in tandem with an argument, that these are unique inventions that should be patented. Similar mutations may have occurred in nature, but only extremely rarely – and dare I say it - so what? You can't seriously be arguing that because something vaguely similar happens in nature and survives less than once in a red blue moon, and is not subject to GM testing, then neither should new techniques capable of spitting out new combinations daily.

We need far more thorough and totally independent testing of all GM organisms way before any release is considered, and we need far more independent and thorough monitoring of releases. We should be ensuring that every new application for any GM organism (including anything produced using CRISPR) must involve new independent testing from scratch. No applicant should be able to rely on another company's safety testing even if the products are supposed to be identical or almost. After all, despite all the supposedly thorough testing of new drugs before their release, well over half of all new drugs prove to have unexpected side effects within 5 years of release – this is in circumstances where adverse effects are not required to be reported. We need far more safety testing, not less.

We need to ensure that full detail of all safety testing is permanently available to the public. The claim that safety testing data is or should be confidential or has commercial value to a company is nonsense . Public safety cannot be guarded by secret and inadequate testing by the proponent.

It is not just public health that is at issue here.

Proposing to deregulate any GM technique, means effectively pouring novel organisms into the environment. This is at a time when we continue to pour greenhouse gasses into the environment, along with the plastics and chemical and nuclear pollutants. We have not properly tested or fully foreseen the consequences of any one of these pollutants, let alone considered possible interactions.

Obviously the same arguments apply to RNA manipulation and gene silencing.

Deregulation of any of these techniques is completely the wrong way to go. Equally deregulating offspring or products on the grounds that no altered DNA is wrong. So you don't expected any unanticipated changes. So test this. It is totally unscientific to claim that the theory means you don't need to test. That is when you most need to test.

Chris Anderson