

Email Submission: Emma Brooks Maher

Office of Gene Technology Regulator

Australian Government – Department of Health

www.ogtr.gov.au

Attention: Dr.Raj Bhula

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SUBMISSION - Regulation of Gene Technology

I have just read the op-ed by Elizabeth Farrelly in yesterday's Sydney Morning Herald (see link) regarding your proposals to update the existing Gene Technology Regulations 2001. I am horrified at what she has to say – and implore the committee considering this matter to take note of her comments as a matter of urgency. Please consider them as being a personal submission, but this time from me.

<http://www.smh.com.au/national/science-s-new-toy-should-scare-us-all-20180215-p4z0hy.html>

Frankly, the very thought of an unregulated market in CRISPR modifications, especially if extended to use in human development, scares me beyond words. The strange ramifications which may follow are highlighted in the beautiful illustration that comes with Ms Farrelly's article. Notwithstanding the extreme visual, it makes a powerful point. What IS the end-game after total de-regulation ?

Although not a scientist, I'm a thoughtful, still-involved 77yo Australian – and one with a particular reason to fear unintended consequences in any well-meaning rush to genetic meddling.

Many years ago, probably in the mid-70's, my career was that of advertising Creative Director. One of the agri-biz campaigns I worked on was the marketing of an "amazing, safe" development to assist the cattle industry – hormone implants. How glowingly I wrote of the weight-gains, the quality of meat yield, the export potential. And we now know how that worked out as the hormones worked their way through the food chain. A disaster.

When I read reports of the human health issues now known to be a direct result, there is a rush of personal and profession shame. I bitterly regret taking all that scientific data at face value – and I castigate those gung-ho gurus who were all so keen to capitalise on these "new" developments, without paying enough attention to the long-game.

So I say – please factor in consideration of what your proposals might mean for "humankind", not just this century but next.

If a good un-regulated outcome depends on everyone doing the right thing – forget it. People won't. They'll cut corners – and genes in whatever way gives a quick-hit in

headline results – or a quick-fix for financial gain. The consequences re cattle have been bad enough, and took decades to reveal the real damage. But at least those hormone treatments are now banned.

I have no problem about updating Gene Technology regulations from 2001 to 2018 – or 2020, or 2050 and beyond. Just don't let your Office be the one responsible for a parallel people-catastrophe. Think wonder-drug thalidomide. Remember always – business and industry groups only see outcomes in terms of their big-biz bottom line.

So on behalf of my gran'kids' gran'kids - I urge you to insist on the pre-cautionary principle - proper controls. Ensure you include whatever it needs for just-in-case, and NO blanket de-regulation. Wherever possible, actively include ongoing review periods, so the OGTR can check use-patterns, monitor outcomes – and thus prevent emerging problems from escalating into a tsunami of lost/damaged lives.

And in regard to foods - if you do allow de-regulation, at least makes sure that consumers can at least know what they're eating. When human health's involved, people have a right to understand what's going into their mouth, to become part of their body. Would they have bought that hormone-beef. ?

While not hi-tech, this submission comes from experience in the real world – which is where the results of gene technology have to play out anyway. I trust you'll give serious consideration to the ramifications of [1] human nature, and [2] unintended consequences.

As my mother often warned “better safe than sorry”. She also used to say --when in doubt, JUST DON'T. It's a good rule for any Regulator.

Thank you the opportunity have this input.

EMMA

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