

07 February 2018

The Regulations Review
The Office of the Gene Technology Regulator
MDP 54
GPO Box 9848
CANBERRA ACT 2601

Submission on the proposed amendments to the Regulations

Grain Growers Limited (GrainGrowers) welcomes the opportunity to provide a submission on the proposed amendments to the Regulations, as part of public consultation for the Technical Review of the Regulations.

GrainGrowers is an independent and technically resourced, grain farmer representative organisation with more than 17,000 members across Australia. GrainGrowers' goal is a more efficient, sustainable and profitable grain production sector that benefits all Australia grain farmers and the wider grains industry.

In our submission dated 14 November 2016, we stated our support for Option 4: Exclude certain new technologies from regulation on the basis of the outcomes they produce. The original Option 4 from the 2016-17 Technical Review would have better applied to plant breeding applications where outcomes can be distinguishable from conventional breeding products. Given that plant breeding is further advanced and carries less risk than other gene technologies, the introduction of Option 4 would have provided opportunities for plant breeding sciences to continue to advance at a substantial rate. However, we feel now that the plant industry, new variety development and advancements in plant biotechnology will proceed at a substantially reduced rate from what would have been their potential should Option 4 have been selected.

In response to the amendments incorporating Option 3 of the 2016-17 Technical Review, we have addressed the consultation questions that are relevant to our organisation:

What is your preferred option?

Our preference is for Option 2 – amend the GT Regulations by introducing all elements of the draft amendments, as detailed in full in section 3 of the Consultation RIS. We have no issue with the drafted amendments and feel their incorporation would be suitable.

Do the draft amendments clearly implement the measures described in Section 3 of the Consultation RIS?

Yes. It is clear that the measures would be clearly implemented by the draft amendments.

What are the costs and benefits to you or your organization from the proposed amendments?

As GrainGrowers is a representative organisation, we are unaffected directly by the proposed amendments as we are not a research organisation.

Are there any features in the options presented that you have concerns with? Or, are there any particular features that you believe should be included?

We understand the selection of Option 3 for the amendments to the Regulations, however we advocate that if possible, specific regulations addressing the plant industry be included so that plant

breeding can progress exponentially. It is very clear what a plant is, therefore we believe a subcategory of regulations relating specifically to plants would achieve this.

GrainGrowers appreciates the opportunity to contribute to this review and is willing to participate in future consultation. Should we be able to provide further assistance or there are enquiries relating to our submission, please contact me on 02 9286 2000 or by email

Yours Sincerely

Michael Southan
CEO Grain Growers Limited

