

20 February 2018

The Regulations Review
The Office of the Gene Technology Regulator (MDP 54)
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To whom it may concern

RE: Response to the 2016-17 [Technical Review of the Gene Technology Regulations 2001](#)

ABOUT THE NATIONAL ASSOCIATION FOR SUSTAINABLE AGRICULTURE

The [National Association for Sustainable Agriculture](#) (NASAA) supports the education of industry and consumers on Organic, Biodynamic and Sustainable agricultural practices. The scope of NASAA's Organic and Biodynamic Standard covers the organic supply chain – from input manufacturers to producers, processors to wholesale and retail operations - ensuring organic integrity 'from paddock to plate'.

With a national office based in South Australia, NASAA is a non-profit company limited by guarantee comprising an Association of Members and [NASAA Certified Organic](#), a fully-owned subsidiary of NASAA which provides the certification services to around 1000 organic operators.

REVIEW FEEDBACK

NASAA supports the intent expressed through this review for greater clarity and less ambiguity within the gene technology regulatory framework.

NASAA supports the repeal of item 1 in Schedule 1

Organisms that have been altered by gene technology should be regulated as genetically modified organisms (GMOs), irrespective of whether any 'foreign nucleic acid' has been introduced.

Deregulation of GM techniques poses a direct threat to the viability of Australia's organic industry

NASAA opposes the proposed deregulation of GM techniques such as CRISPR (SDN-1) when used to make naturally repaired DNA breaks. Deregulating these new techniques means no monitoring or surveillance. In turn, without strict scrutiny, labelling or safety testing, the purity of the domestic food chain, including organically farmed produce, and Australia's reputation for premium, clean "green" products could be eroded.

Deregulation jeopardises organic exports to Australia's major export partners

Amending the current Gene Technology (GT) regulations could also jeopardise equivalency agreements for the export of Australian organic products with both China and the European Union (European Commission (EN 834/2007 & 889/2008)) which require 0%GM input. Note Australia is one of the top three suppliers of organic foods to China, the United States and Europe.

East Asia and Europe already represent 45% of the total Australian certified product export market. By 2018, the total value of organic is anticipated to reach or exceed AU\$2 billion given the current growth trajectory (source: *The Australian Organic Market Report 2017*).

Deregulating new forms of genetic engineering ahead of our major trading partners could impact all food exports

If Australia was to completely deregulate the new GM techniques including CRISPR/Cas9—prior to a formal approval in these trading countries and other markets—it could seriously impact access for all food exports.

Furthermore, should Europe declare all new techniques as GM, traceability and zero tolerance for any GM contamination would be mandatory – as would testing protocols to detect the GMO. Without appropriate regulation, traceability cannot be assured, and without traceability Europe's zero tolerance policy could see a halt to European Union food imports from Australia.

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NASAA opposes the deregulation of null segregants

The definition of a GMO in Australia should include organisms derived *from* GMOs, or those that include temporal GMOs, as is the case in the European Union.

NASAA also opposes the proposed deregulation of RNA interference and gene silencing

The Australian Gene Technology Act defines gene technology as “any technique for the modification of genes or other genetic material”. This definition clearly includes RNA interference and gene silencing.

NASAA supports ongoing stringent monitoring of research involving gene drives in secure containment facilities.

SUMMARY

- **NASAA supports Option Three** (amend the GT Regulations by introducing some, but not all, of the amendment elements from Option Two)
- This is due to the adverse impact on market access for Australian organic producers and processors exporting internationally, particularly to East Asia and Europe.

It would be a slippery slope should the door ever open to genome editing outside of a regulatory framework.

The integrity of our iconic organic certification brand would risk irreversible damage.

Thank you for the opportunity to provide feedback.

Mr Mark Anderson
GENERAL MANAGER