



21 February 2018

Regulations Review
Office of Gene Technology Regulator
Email: ogrt@health.gov.au

To who it may concern,

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the *Technical review of the Gene Technology Regulations 2001 (the Technical Review)*.

The NFF is the voice of Australian farmers and was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

The NFF recognises the potential of gene technology as a valuable tool within agricultural production systems. In Australia, all dealings involving genetically modified organisms (GMOs), from laboratory experiments to the commercial release of crops, are overseen by a rigorous regulatory framework. The responsible and strategic application of gene technology (GT) within Australian production systems thus far has resulted in significant benefits for Australian farmers, the environment, consumers and the Australian economy as a whole. So long as gene technology materials meet all regulatory requirements, farmers and consumers should have the choice of growing and consuming these products.

The NFF is supportive of the Technical Review's objective to clarify definitions and bring GT regulations in line with scientific developments. The NFF recognise that a range of new technology has been developed that creates ambiguity as to what constitutes a GMO, and the NFF is supportive of the OGTR clarifying these definitions, particularly in relation to organisms that have not inherited traits as a result of GT or those that are temporarily modified but the modification is no longer present in the organism.

As such, the NFF is supportive of Option 2 – amend the GT Regulations by introducing all elements of the draft amendments. The NFF agree that the draft amendments will address the 'issues' outlined in the discussion paper and concur that organisms modified using site-directed nucleases without templates to guide genome repair (i.e. SDN-1) should not be regulated, and those using SDN-2 and ODM continue to be regulated. Excluding organisms modified using SDN-1 is appropriate given these organisms do not pose different risks to natural mutants.

The NFF is also supportive of the administrative clarifications outlined in the discussion paper and believe that these amendments will better guide GT researchers and users by refining the language in the Act.

There are however, some concern within the agricultural industry that one of the key amendments proposed – increasing the categorisation of contained dealings with GMO's containing functional gene drives to require a DNIR licence. As these will be dealt with on a case-by-case basis, there is some concern that costs will increase to cover these new arrangements. The NFF seeks clarity over whether the OGTR will be aiming for cost recovery on these additional measures, or whether these additional costs will be absorbed by the OGTR.

Yours sincerely

TONY MAHAR
Chief Executive Officer