

7 May 2015

Ms Marg Will
Secretariat
National Standards Sub Committee
Organic Industry Standards and Certification Council
C/- Department of Agriculture
GPO Box 858
CANBERRA ACT 2601

**RE: NATIONAL STANDARDS SUB COMMITTEE RECOMMENDATIONS
23 MARCH 2015 – REQUEST TO ALTER SECTION 3.3 (GENETIC
MODIFICATION)**

Dear Ms Will

On behalf of Grain Trade Australia I provide the attached submission in response to the *National Standards Sub Committee Recommendations 23 March 2015 – Request to Alter Section 3.3 (Genetic Modification)*.

1. About Grain Trade Australia

Grain Trade Australia (GTA) is the focal point for the commercial grains industry within Australia. It facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy and commercial services to the Australian grain value chain.

GTA members are responsible for over 95% of all grain storage and freight movements made each year in Australia. Over 95% of the grain contracts executed in Australia each year refer to GTA grain standards and/or trade rules.

GTA members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA members are involved in grain trading activities, grain storage, grain for the human consumption and stock feed milling industries.

GTA also attracts membership from organisations to the side of the value chain in related commercial activities such as financial (banking, stock exchanges etc), communications, grain advisory services, and professional services (e.g. solicitors and accountants).

Within this context, GTA provides comment on the abovementioned document.

2. General Comments

The Australian grains industry currently operates according to the principle of coexistence – that is, on the basis of different production systems and supply chains operating concurrently in a responsible, harmonised, profitable and sustainable

manner and in response to changing consumer, market, environmental, agronomic and technology requirements.

GTA recognises that within the Australian grains industry agricultural biotechnology, like other technologies, has the potential to play a major role in meeting the demands of food, feed and industrial consumers and that the industry requires competitive access to such technologies where all regulatory requirements are met.

GTA also recognises the need for supply chains for grain to meet the increasingly diverse market requirements of consumers, including the choice to access products derived from different production systems (i.e. GM, non-GM and organic).

To deliver market choice in a supply chain where different production systems coexist requires the following key elements to be in place:

1. the ability of any supply chain participant to source product that meets a pre-determined set of specifications;
2. the ability of any supply chain participant to supply product that meets a pre-determined set of specifications;
3. the ability of any supply chain participant to manage their area of the production, processing, manufacturing and delivery of product to a pre-determined set of specifications.

The implementation of the supply chain systems which underpin these key elements provides the capacity for industry to maintain or enhance trade in Australian grains and their products, and operate in an open and transparent manner. These systems provide confidence to stakeholders, particularly to customers, consumers and governments that the grains industry can deliver market choice within an environment where differing production systems successfully coexist.

3. Specific Comments

Consistent with its support of market choice and the principles of coexistence, GTA supports the intent of the proposed changes made by Australian Organics Ltd, and recommended by the National Standards Sub-Committee (NSSC) of the Organic Industry Standards and Certification Council (OISCC) at its meeting on 23 March 2015 to add the following statement recognising coexistence as a 'General Principle' in the National Standard:

“As long as an operator has not intentionally used genetically modified organisms or their derivatives and has taken reasonable steps to avoid contact with the products of genetically modified organisms or their derivatives as detailed in their risk management process, the unintentional presence of genetically modified organisms shall not affect the certification of the organic operation. Crops on the organic property, or post-harvest, found to contain any detectable GMO presence shall lose certification as organic.”

While supporting the intent of the proposed recommendation, consistent with its support of market choice and the principles of coexistence, GTA would propose an amendment to the wording of the following draft clause that the Australian Organic Ltd put forward as a secondary proposal for improving the National Standard, namely:

“As long as an operator has not intentionally used genetically modified organisms or their derivatives and has taken reasonable steps to avoid contact with the products of genetically modified organisms or their derivatives as detailed in their risk management process, the unintentional presence of genetically modified organisms shall not affect the certification of the organic operation. Crops on the organic property, or post-harvest, found to contain detectable GMO presence at or above the reportable presence of GMOs in food by FSANZ shall lose certification as organic.”

To be aligned with the key elements that provide the platform for successful coexistence of production systems within a supply chain GTA would propose the following amendment to subparagraph (ii):

“(ii) As long as an operator has not intentionally used genetically modified organisms or their derivatives and has taken reasonable steps to avoid contact with the products of genetically modified organisms or their derivatives as detailed in their risk management process, the unintentional presence of genetically modified organisms shall not affect the certification of the organic operation or crops on the organic property, subject to existing regulatory requirements.

To support the proposed amendment GTA would recommend that the NSCC incorporate within its preamble recognising coexistence as a ‘General Principle’ in the National Standard the key elements which are required to be in place for the successful coexistence of different production systems within the one supply chain, namely.

“To deliver market choice in a supply chain where different production systems coexist requires the following key elements to be in place:

- 1. the ability of any supply chain participant to source product that meets a pre-determined set of specifications;*
- 2. the ability of any supply chain participant to supply product that meets a pre-determined set of specifications;*
- 3. the ability of any supply chain participant to manage their area of the production, processing, manufacturing and delivery of product to a pre-determined set of specifications.”*

Please do not hesitate to contact me, should you require clarification in respect to any aspect of this submission.

Yours sincerely,



Mr. Geoff Honey
Chief Executive Officer