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7 November 2024

Department of Health and Aged Care Via consultation hub

## **RE: Gene Technology Amendment Bill**

Dear Sir/Madam,

Thank for the opportunity to make a submission on the Draft Gene Technology Amendment Bill.

#### 1. About Grain Trade Australia

<u>Grain Trade Australia</u> (GTA) is a national member association and is the focal point for the commercial grain industry within Australia.

GTA has over 295 organisations as members. Their businesses range from regional family businesses to large national and international trading/storage and handling companies who are involved in grain trading activities, grain storage, grain marketing advisory services, processing grain for human consumption and stock feed milling. GTA Members are substantial employers, from the farm gate through to end point consumption, and notably in rural and regional Australia. Australia's grain is exported by GTA members. A full list of GTA Members in annexed to this submission.

GTA acknowledges the potential for gene technologies including GM and gene-edited crops to deliver benefits for Australian farmers, the environment and consumers in Australia and globally.

GTA's core focus is to 'facilitate trade' in the Australian grain industry. Its products and services, including the Australia Grain Industry Code of Practice, provides a self-regulatory framework across the grain industry to facilitate and promote the trade of grain within the Australian grain value chain.

GTA's Plant Breeding Innovation Committee provides advice and input in relation to new breeding technologies (NBTs). In relation to plant breeding innovation, GTA has developed the:

- Market Choice Framework for GM Crops (built on the canola industry's Market Choice Framework developed in 2008); and
- Grain Industry Stewardship Framework for New Technologies where Schedule 1 deals with NBTs.

These tools have been developed to ensure the introduction of these technologies into the supply chain is undertaken in a manner that does not disrupt trade.

GTA is also actively involved in industry discussions on these issues globally via membership of the International Grain Trade Coalition (IGTC), with harmonising of regulations a key focus.

GTA appreciates the opportunity to provide this submission and notes that our comments will be **restricted to the legislation as it relates to plants** and is focused on the principles and integration of technologies into the supply chain once approved. Individual GTA members, technology proponents and groups such as CropLife Australia are better placed to provide comment on the operational aspects of the Act as it relates to potential technologies seeking approval.

# 2. Comments on the proposed amendments to the Gene Technology Act

GTA is pleased to see progress on the proposed amendments to the Gene Technology Act (ACT) which follow from the Third Review of the National Gene Technology Scheme and subsequent consultation. It is pleasing that the Ministers have endorsed the preferred regulatory model, including risk-tiering.



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# 2. Comments on the proposed amendments to the Gene Technology Act

GTA is pleased to see progress on the proposed amendments to the Gene Technology Act (ACT) which follow from the Third Review of the National Gene Technology Scheme and subsequent consultation. It is pleasing that the Ministers have endorsed the preferred regulatory model, including risk-tiering.

At the time of this review GTA emphasised the need for the ACT to be modernised and future proofed and aligned with a science and risk-based set of principles. GTA supported the preferred regulatory model where dealings with GMOs would be classified into authorisation pathways according to the level of risk they pose, a model referred to as the risk-tiering framework.

GTA broadly agrees with the recommendations and supports the move to a risk tiering, science-based approach which will assist to modernise the ACT and ensure it is fit for purpose now and into the future. GTA believes it is very important that the scheme is flexible and able to deal with future developments and challenges such as plant breeding innovations.

GTA believes that the revised structure of the scheme will ensure there is sufficient flexibility to move dealings with GMOs between authorisation categories based on identification of new risks, a history of safe use, and other additional factors. GTA also supports the intent of the changes to reduce regulatory burden through streamlining application processes and regulatory requirements.

# 3. GMO Register

GTA would like to make specific comment in relation to the proposed changes to the GMO register and consultation question in regard to *What should be considered for regulations to prescribe criteria for GMO dealings eligible for inclusion on the GMO Register?* 

The GMO Register is a listing of GMOs that the Office of Gene technology Regulator (OGTR) has classified **as posing minimal risk** to people's health or environmental safety. Products entered onto the GMO Register enables anyone to engage in activity without needing a license or other authorisation under the ACT. Currently, the GMO Register includes dealings with GMOs that have been deemed low-risk by the OGTR in terms of human health and environmental impact. For a dealing to be listed, it must have previously been authorised by a license under the ACT.

The proposed amendments aim to expand the scope of the GMO Register by allowing the OGTR to include dealings authorised by a GMO permit or those that meet criteria specified by the Gene Technology Regulations. This would enable a broader array of dealings to be registered, potentially easing regulatory obligations for certain GMO activities. These changes are designed to create a more adaptable and proportionate regulatory framework and by broadening the range of dealings eligible for the Register, the amendments seek to reduce regulatory demands while still safeguarding human health and the environment.

While GTA supports this move, we have concerns about the fact that there is **no requirement for the Regulator to consult stakeholders** prior to listing a GMO on the Register, and the decision is solely based on considerations of human health and environmental safety. While recognising that the GMOs to be listed on the GM Register pose low risks to human health and the environment, there could be **trade and market access and supply chain implications** for the grain industry if not properly communicated and managed through responsible stewardship.

We recognise (and support) that when undertaking a GMO risk assessment, the OGTR quite rightly does not take non-scientific factors such as trade and market access into account. However, when placing GMOs on the GMO Register, whilst the Regulator may not have concerns from a human health and environmental safety perspective, there may need to be some consideration of the stewardship role played by the original GMO Licence holder. There should be some communication of the proposed changes to ensure that these occur in a way that is trade facilitative and to allow appropriate industry stewardship activities to be implemented should they deemed necessary. .

GTA supports a self-regulatory approach wherever practical and has developed the "*Grain Industry Stewardship Framework for New Technologies*" through broad consultation with the industry. This Framework is focused on ensuring new technologies are brought to market in a trade facilitative way and a key principle of the Framework is early notification which when applied to the GM register would see **notification ahead of the change** so the industry can appropriately communicate with its customers.

While we are supportive of the changes to the GMO Register, we believe that there should be a notification/consultation phase so that the industry can assess implications and work with the technology proponents and/or markets to ensure that there is no disruption to trade.

### 4. Transition of the reforms

GTA is disappointed that there has been a seven-year delay in the implementation of these amendments. This, along the lack of alignment with FSANZ and international standards complicates the regulatory landscape, and potentially raises difficulties for stakeholders to plan and adapt to the new framework. **Clear guidance and timelines for stakeholders** is necessary to ensure a smooth transition.

### 5. Summary

GTA is pleased to see progress on the proposed amendments to the Gene Technology Act. GTA broadly agrees with the recommendations and supports the move to a risk tiering, science-based approach which will assist to modernise the ACT and ensure it is fit for purpose now and into the future.

Specifically, in relation to changes to the GMO Register, GTA would like to see a notification/consultation step in place so that the industry can utilise its self-regulatory framework to ensure that the industry has appropriate time to ensure that any stewardship requirements have been considered and can be implemented as required.

Please do not hesitate to contact GTA at any stage.

Yours faithfully,

POSL

Pat O'Shannassy

**Chief Executive Officer** 



Member Type	1			
	Member Level	Account Name	Primary Contact	Website
Ordinary Member	A1	CBH Group	Ben Macnamara	www.cbh.com.au
		GrainCorp Australia	Robert Spurway	www.graincorp.com.au
		Viterra Australia	Philip Hughes	www.viterra.com.au
		Vicera / idazi dila	3	
	42	Courtly Australia		
	A3	Cargill Australia	Zsolt Kocza	www.cargill.com.au
			1	
	A4	ADM Trading Australia	Darryl Borlase	www.adm.com
		Arrow Commodities	Dominic Vanzella	www.arrowcom.com.au
		Australian Grain Export Pty Ltd	Tim Martin	www.australiangrainexport.com.au
		Bunge Agribusiness Australia	Stephen Bennett	www.bunge.com
		Louis Dreyfus Company Emerald Australia	David Johnson	www.ldc.com
			5	
	B1	CHS Broadbent	Steve Broadbent	www.broadbentgrain.com.au
		George Weston Foods	Michael Schmidt	www.gwf.com.au
		Manildra Group	Peter Sloan	www.manildra.com.au
		Riordan Grain Services	Jim Riordan	www.riordangrains.com.au
			4	
	B2	Centre State Exports	Jeff Voigt	www.centrestateexports.com.au
		ETG Commodities	Peter McMeekin	www.etgworld.com
			Matt Clarke	
		Inghams Enterprise Pty Ltd		www.inghams.com.au
		J K International Pty Ltd	Sandeep Mohan	www.jki.com.au
		Ridley Agriproducts	Reagan Stroud	www.agriproducts.com.au
		Riverina (Australia)	Jon Mulally	www.riverina.com.au
		Wilmar Trading (Australia) Pty Ltd	Matt Albion	www.wilmargavilon.com
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	22	Alliad Planada		-10-401
	B3	Allied Pinnacle	Brett Duczmal	www.alliedmills.com.au
		Brahman Commodities	Michael Aikman	www.brahmancommodities.com.au
		Cofco International Australia	Sarah Pan	www.cofcointernational.com
		Demeter Grains	Barry Mansfield	www.demetergrains.com.au
		K M & W M Kelly & Sons	Matt Kelly	www.kellygrains.com.au
		Quadra Commodities	Robin Cassar	www.quadra.com
		Qube Logistics (SB) Pty Ltd (T/A Qube Agri)	Jeremy Brown	www.qube.com.au
		Robinson Grain Trading	Adam Robinson	www.robinsongrain.com.au
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	C1	Agracom	Joe Hallman	www.agracom.com.au
		Agrisk (Market Check)	Brett Stevenson	www.marketcheck.com.au
		AGT Foods Australia	Michael Brittain	www.agtfoods.com/australia
		Associated Grain t/a Agrocorp Processing Australia	Russell Darbey	www.agrocorp.com.au
		Australian Food & Fibre Processing	Peter Webb	www.australianfoodandfibre.com.au
		Australian Fresh Milk Holdings (AFMH)	Jill Smith	www.afmh.com.au
		BFB Pty Ltd	Shane Bird	www.bfb.com.au
		Blairs Produce Company	Sean Blair	crt.com.au/store/blairs-produce-company/
		Boolah Farms Pty Ltd	Stuart Tighe	www.boolah.com.au
		Castlegate James Australasia Pty Ltd	Kevin O'Brien	www.castlegatejames.com.au
		COPRICE	Hugo Steinfort	www.coprice.com.au
		Darwalla Milling Co Pty Ltd	Gary Heidenreich	www.darwalla.com.au
		DDT Holdings	Rajeev Saraff	www.ddtholdings.com.au
		Deckert Group Pty Ltd	Chris Deckert	www.deckerts.com.au
		Esperance Quality Grains Pty Ltd	Neil Wandel	www.esperencequalitygrains.com
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Advantage Grain Pty Ltd	Chris Nikolaou	www.advantagegrain.com.au
Ag Connex Pty Ltd	Geoff Barker	www.agconnex.com.au
Agmark Commodities	Richard Alcorn	www.agmark.com.au
Agri Om Australia Pty Ltd	Kishore Bulchandani	www.agriom.com.au
Agri-Oz Exports (Aust) Pty Ltd	Francois Darcas	linkedin.com/in/francois-darcas-4a440577
Agromin Australia Pty Ltd	Rajni Patel	www.agromin.com.au
Alliance Grains	Luke Walker	www.alliancegrains.com.au
Arya Pulses Australia Pty Ltd	Aravindhan Ravindraraj	www.aryapulses.com.au
A T Waterfield & Son Pty Ltd	Brad Waterfield	linkedin.com/in/brad-waterfield-8767869b
Australian - Asian Agricultural Exports (AAAX)	Mick Connolly	www.aaax.ws
Australian Choice Exports Pty Ltd	James Hunt	www.australianchoiceexports.com.au
Australian Grain Storage	Matt Bailey	www.sunrice.com.au
Australian Growers Direct Pty Ltd	Tyrone Stowers	www.ausgrowersdirect.com.au
Australian Mungbean Company Pty Ltd	Damien White	www.australianmungbean.com.au
A W Vater & Co	Kim Vater	www.vater.com.au
Baker Grain	Richard Baker	www.bakergrain.com.au
Boort Grain Co-Operative	Jon Bucknall	www.boortco-op.com.au
Broun & Co Pty Ltd	Charles Coventry	www.brounandco.com.au
C & S Trading Pty Ltd	Craig Scholz	www.scholzbh.com.au
Carpendale Agri Pty Ltd	Andrew Kluck	www.carpendale.com.au
Carson Stockfeed Pty Ltd	John Carson	03 6634 7376
Chester Commodities	Richard Black	www.chestercommodities.com.au
C K Tremlett Pty Ltd	Andrew Tremlett	linkedin.com/in/andrew-tremlett-36a06385
CL Commodities	Robert Lean	www.clcommodities.com.au
Coorow Seeds	Brian Pover	www.coorowseeds.com.au
Cory Johnston (Aust) Pty Ltd	Alicia Dolan	www.coryjohnston.com.au
Craig Tyack Grain Trading	Craig Tyack	craig.tyack@bigpond.com
Defiance Maize Products Pty Ltd	Rodney Walker	www.corson.co.nz
Direct Commodities	Hamish Robertson	www.directcommodities.com.au
East Coast Stockfeeds	Stuart Dolden	www.ecsf.com.au
Ellerslie Free Range Farms Pty Ltd	Maria Sue-Tin	www.dahall.com.au
ETG Processing Pty Ltd T/A Wimpak	Brock Tait	www.wimpak.com.au
Excel Farms	Nicholas Paterson	excelfarms.com.au
Export Import Australia	Dhanesh Kumar	www.exportimportaustralia.com.au
Export Trading Group Australia Pty Ltd	Shayne Clark	www.etgworld.com
Fanmac Logisitics Pty Ltd	Chris Fanning	www.fanmacag.com.au
Feed Central Pty Ltd	Tim Ford	www.feedcentral.com.au
Findlays Barellan	Neil Findlay	www.findlay.world/about-us
Gold Star International Pty Ltd	Abhishek Kotkar	www.goldstarinternational.com.au
GO Resources Pty Ltd	Murray Gannon	www.go-resources.com.au
Grainforce Pty Ltd	Stella Larnach	www.grainforce.com
Grain Link WA Pty Ltd	Andrew Goyder	www.grainlink.com.au
Grenfell Commodities Pty Ltd	Glenn Beasley	www.grenfellcomm.com.au
GV Grain & Fodder	Joanne Harry	linkedin.com/in/joanne-harry-707119116
Harwood Grains & Stockfeeds		www.harwoodgrains.com.au
	Paul Harwood Aaron Jones	www.horizoncommodities.com.au
Horizon Commodities Pty Ltd		
HX Food Group (Aus) Pty Ltd	Dong Zhao	www.hxfoodgroup.com.au
Jatlee Australia	Sunil Kumar	www.jatleecorp.com
JH Grain Pty Ltd	Geoff Zhou	www.jhgrain.com.au
J W Koek & Company	Brian Algate	07 3341 4548
Kangaroo Island Pure Grain		
	Emma Tonkin	www.kipuregrain.com
KB Agri Services Pty Ltd	Emma Tonkin Karl Bliss	www.kipuregrain.com linkedin.com/in/karl-bliss-916bb679
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	Karl Bliss	linkedin.com/in/karl-bliss-916bb679
Kennett Rural Services Pty Ltd	Karl Bliss Andrew Kennett	linkedin.com/in/karl-bliss-916bb679 www.kennettrural.com.au
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	Grain Growers Limited (GGL)	Shona Gawel	www.graingrowers.com.au
	Grain Industry Association of WA (GIWA)	Peter Nash	www.giwa.org.au
	Grain Producers Australia Ltd (GPA)	Colin Bettles	www.grainproducers.com.au
	NSW Farmers Association	Elen Welch	www.nswfarmers.org.au
	Stock Feed Manufacturers' Council of Australia (SFMCA)	Duncan Rowland	www.sfmca.com.au
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Merchant Association	Grain Industry Association of SA (GIASA)	Marie Cunningham	www.giasa.org.au
merenance Association	Grain Industry Association of SA (GIASA)  Grain Industry Association of VIC (GIAV)	Colin Peace	www.giav.com.au
	Grain NSW	Joanne Ware	www.grav.com.au www.grainnsw.com.au
	Queensland Agricultural Merchants (QAM)	Rob Imray	www.qam.org.au
	Queensianu Agriculturai Merchants (QAM)	4	www.qam.org.du
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