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GTMC Secretariat
Department of Health and Ageing
MDP138
GPO Box 9848
Canberra ACT 2609

Dear Sir/Madam

Thank you for the opportunity to participate into the Review of the Gene Technology Act 2000.

COGGO is a public company formed at the initiative of a group of Western Australian grain growers concerned at the inadequate resources being allocated to plant breeding and biotechnology in Western Australia, and who wanted to have a greater say in breeding crop varieties for Western Australian grain growers.

COGGO was established in 1997 when grower members took the first step in controlling their own future by voluntarily contributing 0.5% of their net farm-gate value of production for investment in plant breeding and associated R&D through COGGO. This contribution is now playing a major role in assisting Western Australia to maintain its market competitiveness and viability in the grains business.

The Company is a shareholder in Canola Breeders WA and has interests in wheat breeding and pulse breeding ventures.

In brief the positive and negatives that COGGO believe exists with respect to the Act and its operation, with particular respect to plant breeding and commercialisation, are as follows:

Positives

- The Gene Technology Act and the OGTR have generally been very effective in advancing the development of gene technology in Australia
- The OGTR communication process has been proactive with the office now well recognized for its work and role
- To date GTTAC and GTTAC appears to have taken a methodical science and consultative based approach to matters under review

Negatives

- Unfortunately, as a consequence of the opportunity for the States to implement legislation around market and trade considerations, a national approach has not been achieved. In turn this adds confusion, uncertainty and costs upon many participants in the value chain (e.g. GM canola seed cannot be transferred through SA resulting in

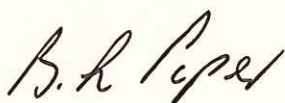
logistic problems, additional costs and in some cases delays in growers being able to access seed when needed)

Other Considerations

- It is very important that gene technology framework remain science based
- Consideration needs to be given to the emergence of smaller plant breeding companies and/or research companies/institutions that are engaging in biotechnology and related research, development and commercialisation. These companies often have limited funding but the potential to make significant contribution to Australian agriculture. Their sustainability will be impacted by future operation of the Gene Technology Act and the interrelationships with State based legislation. Potential constraints to the uptake of the technology will limit investment and support from domestic and overseas investors and technology providers
- It is probable that investment in "stacked traits" in Australia will not be significant or in the worst case be curtailed unless some of the current issues (lack of a national system and clear path to market) can be addressed
- Widespread and concise communication of gene technology issues and the OGTR role is paramount to industry and consumer confidence. This area should remain a focus

In summary the Gene Technology Act and the OGTR have been very important to Australian agriculture with good progress made on a number of fronts since inception. Agriculture in Australia remains very dynamic and at this time when farmers across the nation are facing increasing challenges it is important that the OGTR remain focused ensuring rigorous assessment of the science, effective communication of gene technology matters and improving the effectiveness of the system by examining/introducing changes that will result in national co-operation allowing a transparent path to market.

Yours faithfully

A handwritten signature in black ink that reads "B. R. Piper". The signature is written in a cursive, slightly slanted style.

Bruce Piper
Chairman