

## The 2017 Review of the Gene Technology Scheme

### Terms of Reference

The Review will investigate the National Gene Technology Scheme (the Scheme), including gene technology legislation, the Gene Technology Agreement and its interface with other regulatory schemes. The Review aims to improve and strengthen the Scheme's effectiveness, whilst ensuring it is appropriately agile and supports innovation. The Review will include, but not be limited to, assessing and making recommendations in relation to:

- 1) current developments and techniques, as well as extensions and advancements in gene technology to ensure the Scheme can accommodate continued technological development.
- 2) existing and potential mechanisms to facilitate an agile and effective Scheme, which will ensure continued protection of health and safety of people and the environment.
- 3) the appropriate legislative arrangements to meet the needs of the Scheme, now and into the future, including the Gene Technology Agreement.
- 4) funding arrangements to ensure sustainable funding levels and mechanisms are aligned with the level and depth of activity to support the Scheme.

Dear Reviewers,

As a practicing farmer and agronomist and a champion for sustainable agriculture and winner of the 2009 Federal McKell Medal I write to express my frustration over the impact of this regulatory process. While the expensive registration process of GM crops has been in-line with a global thrust, as point two of the terms of reference points out, "ensure continued protection of health and safety of people". The reality is that this OGTR process discriminates against Australian farmers and our agricultural productivity.

Large companies can afford to insert GM genes (and jump the regulatory hurdle) into their most economically beneficial crops like; corn, soya, cotton, alfalfa, sugar beet and canola, but these crops are mostly grown in the Americas. In contrast, due to the expensive GM regulation costs, we in Australia can see no potential future for GM gene insertions for wheat that would lift our rural productivity. There is currently no real appetite for any significant company (Monsanto, Bayer, AGT, Dow etc), nor government agency in GRDC, CSIRO and the state Departments of Agriculture to register important GM crops as the regulatory hurdle is too onerous and expensive. In Western Australia we export nearly 90% of what we grow and our crops have to compete with mostly GM corn or soybean. This inequity has been hurting our agriculture increasingly every year since those crops were first GMed overseas in 1996. For 20 years this technology has cruelled our farmers and rural towns as we are each year increasingly uncompetitive.

Is there really a genuine risk of someone intentionally inserting a toxic gene into a new GM crop? This notion makes no sense commercially and presents no greater a risk than with conventional breeding, so is OGTR's mandate to "ensure continued protection of health and safety of people" a valid position? However, it seems to me that this powerful GM tool could have made so much difference to Australian agriculture but it seems that it has "died on the vine". As a passionate supporter and global champion of sustainable no-tillage agriculture, I believe this is a catastrophe for Australian agriculture.

While "*The Review aims to improve and strengthen the Scheme's effectiveness, whilst ensuring it is appropriately agile and **supports innovation***" the reality is, it has stifled our agricultural innovation.

At the same time it has put our rural Wheatbelt at an increasingly painful economically uncompetitive disadvantage. Our farmers have had to double their farm size about every 10-15 years, to remain profitable and this exposes, even the best of our operators, to huge financial and emotional stress and risk, especially when two poor years dovetail. While some may blame our lack of genetic progress on climate change, the truth is our 40 year old wheat varieties still yield similarly to recently released cultivars. In contrast, corn yields in the USA, with 12 stacked GM traits, go up near 10-fold more than our wheat in the last decade.

Indeed, the end result has been that this registration process and cost has stifled our innovation! This contrasts the stated purpose of the OGTR. What can be done to rectify this problem? Firstly, we need to acknowledge that this Australian agricultural history lesson is a case of “Bootleggers versus Baptists”, or Greenpeace versus Monsanto. It will go down as the *decades of rural decline* which accelerated due to an era of “political correctness” where government employees or government did not provide the appropriate governance or scientific push-back. Secondly, is there time and a determination to fix this problem and stop the economic and social damage that has been done to Australian agriculture? I hope so, and soon! Please consider these thoughts and lead with sensible and sustainable changes enabling our agriculture access to this, so far, a wasted technology.

Sincerely

Bill Crabtree

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