

Submission to the Review of the National Gene Technology Regulatory Scheme

I am writing to encourage the Review to consider the following points:

- That the Precautionary Principle should be applied to gene technology and new developments therein; that is, those seeking to use gene technology should be required to demonstrate safety first before implementing the technology, even if such demonstration requires substantial time and expense. We must err in the direction of first protecting the environment and human beings within the environment.
- That the regulations recognise that gene technology is not precise and carries within it considerable potential for unexpected mutations, some of which may not be desirable. New technologies such as CRISPR need to be regulated in plants, animals and microbes in order to protect the public and the environment from inadvertent error.
- States must be allowed to protect their markets using GM crop bans if their legislatures vote to do so.
- GM labelling must be allowed and ideally required by legislation in all jurisdictions. Consumers must be allowed to know what is the specific content and nature of food and other products, for the reason of the right to have informed consumer choice and also for those who have complex health concerns to be enabled to be fully informed about what goes into their bodies. Further, processed GM ingredients (such as canola oil or synbio vanillin produced by GM yeast) should be labelled as a matter of consumer choice.
- It should be illegal for GM crops to contaminate organic crops and substantial penalties for this error should be put in place. If the GM crop industry cannot control contamination it should not be allowed to grow GM crops anywhere near organic farms and should sustain full liability for contamination.
- The scheme for assessing the safety of GM crops and foods must be expanded to require data provided by sources independent of the companies applying to commercialise the GMO. Not to do so is to put the fox in charge of the hen house, which is unwise and unreasonable.
- A health monitoring system should be put in place for the long term assessment of unexpected effects from the consumption of GM foods.
- The environmental impact of GM crops, particularly the relation and impact of herbicides associated with them, needs to be fully assessed through a monitoring system carried out over the long term.
- The Gene Technology Act should be amended to assure that the GM industry is held strictly liable for any losses that result due to GM contamination.
- The public should be given equal status to appeal decisions made under the Gene Technology Act as is given to industry.

Thank you.

Submitted by: Dr Mary-Faeth Chenery

Date: 19 August 2017