

The Regulations Review, The Office of the Gene Technology Regulator (MDP 54)
GPO Box 9848, Canberra ACT 2601
Via email: OGTR@health.gov.au

21 February 2017

Dear Madam/Sir,

2016-17 Technical Review of the Gene Technology Regulations 2001

Introduction

Cotton Australia welcomes the opportunity to provide comment and, as the representative body, speak on behalf of cotton growers regarding the *2016-17 Technical Review of the Gene Technology Regulations 2001*. Our responses are framed by the perspective of users of gene technology who operate within an agricultural industry known for being keen adopters of new technologies.

Question 1

Cotton Australia strongly supports the objectives of the Technical Review; to address ambiguity regarding what constitutes a genetically modified organism, to bring regulation in line with recent scientific advancement for gene technologies, and to ensure that that regulation remains grounded in science and aligned with risk.

Cotton Australia supports Option 2 - *amend the GT Regulations by introducing all elements of the draft amendments, as detailed in full in section 3 of the Consultation RIS*. These changes should be implemented as soon as possible to ensure they meet immediate needs.

In line with our previous submission to the technical review of the gene technology regulations, Cotton Australia recommends that Option 2 be implemented with a view toward considering the properties of the final organism as the regulatory trigger.

Questions 4 & 6

Concerning productivity gains, the widespread adoption of transgenic insecticidal cotton varieties has safely delivered significant advances in international competitiveness and environmental sustainability for the Australian cotton industry.

Notably, these advances have been achieved through strong industry consultation regarding stewardship of gene technologies. Collaboration between gene technology providers, chemical registrants, and industry groups have ensured the longevity of cotton gene technology in Australia, contrary to compromised efficacy for cotton gene technology in overseas cotton production areas.

It is expected that improved access to elite germplasm containing traits derived using novel gene technologies would further improve the industry's productivity and sustainability credentials.

Also essential for moving forward with changes to the regulatory environment for biotechnology is improved stakeholder engagement. Changes to gene technology regulation in Australia should be mindful of consumer concerns regarding the safety of GMOs. Cotton Australia recommends that any changes to regulation is accompanied by a communication strategy which present scientific rationale in a manner that speaks to identified community and consumer concerns. Increased transparency and engagement with growers participating in regulated field trials should also be considered.

Conclusion

Cotton Australia is highly supportive of using best available science to inform policy decisions and ensuring that new developments including technology updates are considered when both developing and revising the necessity of regulation.

In this respect, it is of the utmost importance that the Australian regulatory system for gene technology remains science-based and aligned with risk. It also needs to be, flexible to accommodate new technologies, transparent, predictable and independent from political influence. Failing to include these considerations would put at risk the ability of Australian agriculture to attract international investment for scientific innovation.

As a final observation it is imperative that the policy settings align with international regulation and in the longer term, these arrangements move to exclude certain new technologies from regulation based on the outcomes they produce.

Cotton Australia welcomes any opportunity to provide further information regarding this position. For more information, contact Nicola Cottee, Policy Officer on 02 9669 5222 or nicolac@cotton.org.au

Yours sincerely,



Dr. Nicola Cottee
Policy Officer - Research Direction, and Stewardship

External links to previous Cotton Australia submission relevant to this position paper

Cotton Australia submission to the Productivity Commission Regulation of Agriculture:

http://cottonaustralia.com.au/uploads/publications/CA_Regulation_of_Agriculture_DraftReport.pdf

Cotton Australia submission to the technical review of the gene technology regulations:

http://cottonaustralia.com.au/uploads/publications/GeneTechnologyRegulationsReview_CottonAustralia.pdf

Cotton Australia submission to the Legislative and Governance Forum on Gene Technology:

http://cottonaustralia.com.au/uploads/publications/2017ReviewGeneTechnologyScheme_CottonAustralia.pdf