

## **Tasmanian Public & Environmental Health Network (TPEHN)**

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### **2019- Review of Tasmania's GMO Moratorium.**

Tasmania is one of the few places in the world which is fruit fly free and has a moratorium on growing and commercially cultivating genetically modified (GM) crops/food stuffs. Fruit growers, beekeepers, wine producers and dairy producers already command higher prices for high value products using the branding of Tasmania which is seen as producing safe, clean and environmentally sustainable foods and beverages.

GM foods is in the top 5 food consumer concerns globally.

Continuing with the moratorium gives Tasmanian primary producers and food and beverage manufacturers a clear competitive advantage in the domestic and global market (China, EU, Japan, Korea and US). It will ensure certainty to trading partners and maintain and probably increase its market position as the global demand for GM free products is on the increase. There is currently a clear financial premium for GM free versus GM crops; e.g. Victorian canola in Nov 2017 where the price difference was \$40/ton.

A 2016 report by University of Adelaide (The Bignell Report) indicated the global market for GM free labelled foods and beverages would reach \$US 949 billion by 2018 (it was \$US 521 billion in 2014).

Currently SA, ACT and NT have maintained their GM free status, confirming the benefits of remaining so.

Many statements and assurances regarding the economic advantages of growing GM crops have not been shown to be correct e.g. nitrogen fixation, drought and salt tolerance, increase protein percentage, increase yield and faster growth. There are also increasing problems with herbicide resistance with GM herbicide tolerant strains (RoundUp immediately springs to mind as a classic example) adding to the economic burden of cropping as a viable industry. This is apart from the health and safety aspects of pesticide use, both to farmers and workers and consumers. Class actions involving RoundUp are already sitting on lawyers' desks.

The present Office of Gene Technology Regulations Review and the National Gene Technology Scheme Review both propose to exempt several new and emerging GM techniques and their products from any review or regulation. This is despite a short history of safe use and sound scientific evidence that shows the new GM techniques - CRISPR, ZFN, and TALEN (SDN1) – tend to chop DNA rather than cutting it precisely and have off-target genome wide effects which are hard to identify and therefore track in marketed foods/products.

To achieve this deregulation, the GM industry want SDN1 redefined as outside the scope of the Gene Technology Act 2000. Yet the federal parliament, which passed the Act, and the

state and territory governments that joined the national regulatory scheme, all agreed the Act's definition of GM would be robust enough to cover new Genetic Manipulation innovations.

However, when the Legislative and Governance Forum on Gene Technology (LGFGT) met in Adelaide on October 11, 2018, State Ministers called for further advice on the proposal to deregulate SDN1 GM techniques, before they made any final decision. Their communiqué read, "Forum Ministers welcomed the Technical Review and requested further advice in relation to amendments to the Gene Technology Regulations 2000 (Commonwealth, the Regulations) recommended by the Gene Technology Regulator."

Contrary to the OGTR's claims, the proposed deregulatory changes are not merely technical amendments. Amending the definition of 'Genetic Modification' in the Act, as proposed, would be a key step in GM deregulation in Australia. Our governments always intended the original, broad definition to capture new and emerging techniques for regulation.

The proposed new definition would significantly narrow the scope and undermine the objectives of the Gene Technology Act 2000. If the processes and products of new GM techniques were to replace the old transgenic methods, the GM regulatory system and the Gene Technology Act may become moribund, as fewer and fewer processes and products were subject to precautionary regulation.

This may have the real effect of decreasing consumer market acceptability of products and therefore decreasing the price of the products. The actual effects on crop yields and growth in the medium and long term are at present unknown.

In view of all of the above, we advocate for the moratorium of GM crops/foods/foodstuffs and all animals to be continued in Tasmania for the foreseeable future.

Dr Alison Bleaney OBE

*"In questions of science, the authority of a thousand is not worth the humble reasoning of a single individual."* Quoted in Arago, *Eulogy of Galileo* (1874)