

Mr John Whittington

Secretary

Department of Primary Industries, Parks, Water and Environment
Hobart, TAS 7001

By email: GMOMoratoriumReview@dpiwve.tas.gov.au

Dear Mr Whittington,

Re: Genetically Modified Organism (GMO) Moratorium Review 2019

Thankyou for the opportunity to provide comment on the ongoing review of the Tasmania's GMO Moratorium Biosecurity Act (2019).

Fruit Growers Tasmania (FGT) is the Tasmanian industry association for the state's fruit and berry producers, and provides Tasmanian fruit producers with technical support services and information across a range of production and trade issues including food safety testing, biosecurity monitoring, quarantine inspection, labelling and freight requirements for fruit products destined for China, Taiwan, Japan, Korea, Thailand and/or Vietnam.

Fruit Growers Tasmania supports the continuation of Tasmania's genetically modified organisms (GMO) moratorium, and welcomes the opportunity to put forward a submission for the consideration of the reviewers. It is the view of FGT members and staff that this Tasmanian moratorium provides an effective method for addressing key market-related issues associated with the introduction of GMO cultivation in Tasmania until a better solution can be developed. These issues include but are not limited to (i) damage to product marketing and regional branding, (ii) the introduction of compliance issues and the costs thereof for non-GMO producers, as well as (iii) disruption to export market access for some products, each of which will disproportionately affect growers of non-GMO crops.

Damage to product marketing and regional branding

It is the belief of FGT that lifting of Tasmania's GMO moratorium would weaken the trading position of producers and exporters of Tasmanian agrifood products. Consumer surveys across many of Tasmania's key export markets indicate that a significant proportion of the population question the safety of GMOs and view them as a potentially harmful contaminant within their food, whilst others view them as unnatural and a threat to the natural world.

Tasmanian agrifood producers have had success in international markets key markets by developing a trusted reputation as providers of premium and ultra-premium products to discerning international consumers, who value the superior safety, purity, quality and exclusivity of Tasmanian products. These products include fruit, seafood, wine, cider, hops, spirits and superfine wool products that are internationally recognised for their commitments to sustainability, ethics, and uniqueness.

By lifting the moratorium to permit GMO cultivation and production in Tasmania, Tasmanian producers risk eroding consumer confidence and trust in its products and undermining our ability to compete as high-cost producers within a globally-connected marketplace. Nationally, there is also

evidence of a growing market premium for GMO-free products in some markets. These opportunities are growing in countries that Tasmania trades with, including but not limited to Japan, Korea, China and the European Union. In South Australia, specialty grain companies like Kangaroo Island Pure Grain have been able to build on this demand for GMO-free products.

To capitalise on current and future increases in global demand for GMO-free products, it is important to recognise that GMO varieties have been commercialised for only a small number of agricultural crops, and these opportunities are likely to expand as registered GMO's crops become more diverse and their cultivation more widespread. Tasmanian businesses seeking to capitalise on these premiums will need to be producing and exporting certified GMO-free products in receptive markets with a significant GMO presence.

Financial impost to non-GMO producers

It is important to note that there are a number of agrifood producers who wish to produce GMO that is certifiably free of GMO material. These include producers of organically certified products, GMO-free products, and/or producers looking to export products into markets where GMO-material is restricted, prohibited or disfavoured by consumers.

GMO contamination has been shown to have significant detrimental impacts on the ability non-GM equivalent crops to coexist due to GMO gene flow. Gene flow represents the unwanted spread of novel genetic material from GMO's to surrounding crops through pollen. For this reason, GMO contamination is likely to be most significant in crops which rely upon pollination, including fruits, nuts, cereals, grains, seed-crops, and industrial or pharmaceutical crops including pyrethrum and poppies.

The costs to growers to monitor and managing GMO contamination risks can be significant. Management of these risks involves the introduction monitoring and testing practices to identify and manage GMO contamination risks. In the event of a significant detection, producers of certified GMO-free material may face product recall and/or market closure. In Spain, the combined costs associated with testing and contamination has led to the virtual extinction of domestic organic maize production, and must be imported from other countries.

In Tasmania, these risks and costs of GMO contamination management are likely to be higher than other parts of Australia due to Tasmanian agricultures smaller field sizes and closer proximity to neighbouring farms, orchards and other production areas. When combined with minimum effective sample numbers, this can increase the costs of sample collection and testing significantly. Due to these factors, the financial cost to growers to develop and implement GMO contamination testing regimes will be significant and ongoing, and will ultimately be borne by the producers seeking to produce product free of GMO contamination.

The presence of Tasmania's moratorium on the non-proliferation of GMOs within the state offers significant benefits for specialised and/or export producers in this area. By ensuring the non-proliferation of GMOs within the state, it eliminates the risk of GMO/GMO-free producers operating in close proximity. In addition, it protects growers more distant growers from the risk of contamination through third party contractors (including but not limited to commercial pollination service providers). Lastly, it eliminates the need to for growers continuously demonstrate proof-of-freedom of GMO contamination for GMO import restrictions for all global markets. Producers are assumed compliant unless demonstrated to be otherwise.

Disruption to export market access

Tasmania's moratorium and demonstrable freedom from GMOs protects producers and exporters from market access disruption caused by differences in GMO legislation. Our international trading partners maintain strict regulations about the importation and cultivations of GMOs inside their borders and maintain a strict zero-tolerance approach to the cultivation and/or import of non-approved GMOs. GMOs are required to be individually registered and approved for import and cultivation in each respective country, and may be subsequently de-registered at a later date. This creates challenges with compliance in the face of changing legislative requirements, where specific GMOs are approved for use in some countries but not others, or may have been registered for use and have been de-registered after escaping into non-GMO varietal lines.

Many of Tasmania's major trading partners have strict zero-tolerance policies for non-approved GMOs, including China, Japan, South Korea and the European Union. To date, compliance with these policies has created no issues for Tasmanian producers due to our ongoing moratorium, but has periodically created uncertainty for agrifood producers in countries with more permissive attitudes to GMOs. Examples of this include the suspension of Canadian flax seed exports to after it was found to be contaminated with prohibited (de-registered) genetic material, and the ongoing uncertainty over global honey exports to the EU where it can be shown to contain detectable quantities of non-permitted GMO pollen.

Conclusions

In consideration of all these broader financial and market-related issues, FGT supports the continuation of the current moratorium. In the view of our members and our industry, the moratorium represents a valuable legislative framework for managing of GMO issues in a manner that is transparent, fair and respectful of the current needs of Tasmania's diverse community of agricultural producers.

At this stage, almost all of them Tasmania's fruit growers have noted that they support extending the moratorium at this time. Most of Tasmania's fruit producers support the continuation of the moratorium because it speaks to who Tasmanian's are as a people. It reaffirms our commitment to key Tasmanian values like environmental sustainability, food purity and safety, and exclusive batches of superior artisanal products. These traits already provide us with a significant marketing advantage, reaffirms to our local and international customers Tasmania's ongoing commitment to supplying the best, safest and most desirable agrifood products.

Currently, the moratorium currently provides little additional financial return for most Tasmanian producers beyond Tasmania's existing brand, but the opportunity costs associated with extending the moratorium is considered negligible due to the limited diversity of GMO-registered crops. Most growers have noted that continuation of the moratorium may create future marketing opportunities as GMO's become more widespread globally, but that these opportunities will not eventuate if the moratorium is discontinued.

Yours sincerely,



Stuart Burgess
Chief Executive Officer,
Fruit Growers Tasmania