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2nd April 2019

GMO Moratorium Review
GPO Box 44
Hobart, Tasmania, 7001

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

Dear Sir/Madam,

Re: Submission on the review of Tasmania's genetically modified organisms (GMO) Moratorium

I am pleased to provide the following submission from Tasmanian Agricultural Producers Pty Ltd, trading as TAP Agrico (TAP) to the review panel for Tasmania's genetically modified organisms (GMO) Moratorium.

TAP is also pleased to confirm that it is interested in receiving any updates about this consultation.

All correspondence regarding this submission and the consultation process can be addressed to;

David Skipper
Managing Director TAP Agrico

If you have any questions do not hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "David Skipper", written in a cursive style.

David Skipper
Managing Director

**TAP AgriCo's submission on the review of
Tasmania's genetically modified organisms
(GMO) Moratorium**

April 2019

INTRODUCTION

Tasmanian Agricultural Producers Pty Ltd trading as TAP AgriCo (TAP) welcomes the opportunity to provide the following submission to the review of the moratorium growing of genetically modified crops in Tasmania.

TAP is the largest cereal grain storage business in Tasmania. TAP predominately trades grain and stockfeed products domestically in Tasmania. TAP are the major buyers of local canola seed and exporters of canola seed to South Korea and previously to Japan. TAP is attempting to resume our export relationship with Japan, and we will continue to increase our export of Non GM canola to Korea over the next 3 – 5 years. TAP's export market into Japan was lost to our competitor, Kangaroo Island, South Australia in part due to cost and their ability to consistently supply that market with non-GM canola seed.

The TAP supplier base comprises of approximately 80-100 grain growers and many grow canola as part of their crop rotations. Canola is an important rotation crop as it is a bio fumigant and allows the soil to revitalise after cereals and poppies.

We have a stated position that Tasmania's point of difference in food production is the perception of fresh, natural and clean. They are the key values that we have used to market our canola into Korea and Japan. Lifting the GMO moratorium would contaminate that market perception. However, for Tasmanian producers to be competitive in Non-GM markets, we need continual access to new varieties which provide higher yields and better agronomic packages. In order for this to happen, TAP want this review panel to consider amending the *Adventitious Presence* (AP) threshold for importing, in Tasmania, Non-GM canola seed sold for *sowing*.

Currently, Tasmania has imposed a threshold of 0.01% of AP, this is effectively a zero tolerance. The Tasmanian threshold is not in line with other Australian states' Non GM standards and severely restricts Tasmanian access to new varieties of canola seed and compliance costs of importing this seed is very risky and prohibitive.

The current zero tolerance level is restricting national seed companies to supply Tasmania with non-GM canola seed for sowing. This is because of the cost and high risk of failure at the test repetition levels required to meet the lowest possible detection levels. Growers have also indicated that they are losing productivity gains because of the reduced ability to access new seed lines.

While adventitious presence can be minimized, as a practical matter it cannot be eliminated entirely. As a result, allowances for adventitious presence have been recognized in laws, regulations and standards that establish allowances for these materials.

We believe the current Tasmanian testing protocol needs to be reviewed and altered from the current detection requirements of 1 in 10 000 seeds and more in line with a protocol of 1 in 2,000 seeds as required by other Non GM competitor countries and in line with all states of Australia. The new alternative testing would provide DPIPWE with the highest level of confidence (95%) that the inadvertent presence of 1 GM seed in 2,000 seeds and places Tasmanian in line with all states and territories as the minimum standard for the industry.

KEY POINTS

1. To alter the Tasmanian *Adventitious Presence* (AP) thresholds for importing GM free canola seed for planting from 0.01% to the practical and national setting of 0.05%.
2. Compliance costs in seed importation and access to new improved non GM varieties for this state's agriculture increase non-linearly as AP thresholds diminish.
3. The current AP threshold of 0.01% undermines the competitiveness of Tasmanian producers to produce canola seed for export and domestic consumption and puts at risk growing canola in the state altogether.
4. The current zero tolerance level is restricting national seed companies to supply the State with non-GM canola seed. This is because of the cost and high risk of failure at the test repetition levels required to meet the lowest possible detection levels.
5. Growers have indicated that they are losing the potential for productivity gains because of the reduced ability to access new seed lines.
6. Having the GMO moratorium in place in Tasmania is leading to market penetration to Asia and will help with growth and innovation in the State's agricultural sector. However, we need to be competitive with other Australian states and have access to new non GM material by aligning our AP threshold to the national acceptance levels.

CONCLUSION

Tasmania's current position on the *Adventitious Presence* tolerance of 0.01% for canola sowing seed is more arduous to that of any other State in Australia and for no apparent commercial purpose.

Tasmanian canola growers and seed merchandisers are encouraging for a change to the current threshold to the nationally recognized non-GM standard at 0.05% AP. This change will significantly reduce costs and risks, allow more variety and new varieties of non GM canola to be planted and place Tasmanian canola on an equal footing when competing into the same Non GM international markets. Evidence of restricting the varieties grown and increased costs has seen the loss of the Japanese market to South Australia.

TAP Agrico also strongly reject and refute the statement as written in *GMO Annual Environmental Scan 2017 Page. 43*, where it states; *"that Industry bodies connected with the growing of canola in Tasmania have confirmed that there has been no shortage of suitable canola seed for sowing this growing season. AgriGrowth Tasmania will continue to monitor the situation"*.

It needs to be said, that we are all struggling to obtain new clean material into the State and many farmers and merchandisers are retaining old and outdated seed material to continue to plant canola. This situation is not sustainable and will lead to less canola being grown as disease and rising cost take hold and, it is highly probable, we will see the loss of important exports markets as we will not be able to supply the volumes required.

Reducing barriers such as realigning the Adventitious Presence threshold for sowing seed will improve productivity, and it will still maintain the Tasmanian Brand, and it will in no way affect the status of Tasmania's NON-GM Moratorium. The Asian markets that TAP is exposed to are only concerned that we meet the international standard of 0.9% (EU approved GMOs in non-GM seed and grain for use in food and feed is 0.9 per cent). This level is far above the strict and near impossible Tasmanian standard. By slightly adjusting the Adventitious Presence tolerance, it will not pose any potential higher risk of contamination of GM material and will not 'taint' the brand position of our products in the Asian markets.