



Department Primary Industries, Parks, Water and Environment
GMO Moratorium Review
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The Tasmanian Farmers and Graziers Association (TFGA) is the leading representative body for Tasmanian primary producers. TFGA members are responsible for generating approximately 80% of the value created by the Tasmanian agricultural sector.

The TFGA is grateful for the opportunity to provide comment on the current review of the Tasmanian Genetically Modified Organism (GMO) moratorium. TFGA represents a range of agricultural industries, including horticulture, dairy, livestock, wool and cropping. The moratorium on genetically modified organisms (GMOs) impacts on each industry in different ways and levels, and therefore all need to be considered when evaluating the review of the moratorium.

The current TFGA policy on the GMO moratorium is supportive, due to potential economic benefits to Tasmania through the unique position of being GMO free. Our policy states that the moratorium be reviewed regularly, due to the constant and rapid changes in available technology. We also believe the State Government needs to continue to invest in promoting the GMO-free status of Tasmania to ensure the full economic benefits are met. Importantly, TFGA also reserves the right to change our position if the situation of GMO technology and benefits to Tasmania changes.

Tasmanian legislation prohibits the use of GMOs in food crops under the *Genetically Modified Organisms Control Act 2004* and the *Tasmanian Gene Technology Policy 2014-2019*. Since 2004 the GMO moratorium has expired twice in 2007 and 2014 and been reviewed each time. Both reviews resulted in a continuation of the moratorium, which is now again under review.

During this current review we have again consulted with our members, across commodities, to determine their views on continuing or removing the moratorium. After this consultation, we believe that the GMO moratorium should remain in place. This is due to the economic benefits to Tasmanian agriculture of a unique GMO-free status, including Tasmanian beef that is currently marketed as GMO free.

However, the advantage of being GMO free is not being utilised across all agriculture industries in Tasmania. We recommend that the State Government increase its investment in marketing and promoting our GMO-free status to allow Tasmania to fully benefit from the unique status of being GMO free. This is vital if we are to retain the moratorium to ensure that while we are losing access to some gene editing and GMO technology, we are able to gain a premium price for our produce. To continue the moratorium, hard evidence will be needed on the marketing advantage to Tasmania. We do, however, recognise that that Department of State Growth is currently undertaking a review of interstate and overseas markets for Tasmanian food products and we look forward to the results of this review.

We also recognise the differences in gene editing and genetic modification technology and the availability of some gene editing technology to Tasmania, while maintaining the GMO moratorium. Recent amendments to the *National Gene Technology Regulations 2001* by the Australian Gene Technology Regulator to gene editing technology Zinc Finger Nuclease (ZFN) gene deletion, is one such case. The Australian agriculture sector is already using this technology to its advantage with the development of a new ryegrass with increased digestibility and available metabolisable energy, benefiting dairy and other livestock industries. Deregulation of this technology will allow it to be used in Tasmania while maintaining the moratorium on GMOs.

However, while Tasmanian agriculture can access the ZFN technology and continue to be GMO free, there are other technologies that are unavailable to us. This is true for both plants and animals and the disadvantage of not accessing this technology to Tasmanian needs to be considered. As technologies in gene editing and genetic modification continue to evolve and be better understood, we need to be open to changing the moratorium if needed to access this technology. Gene editing and GMO technology is rapidly evolving and changing, and we need to be aware of these changes and how they could benefit Tasmanian agriculture. If the benefits outweigh the gains of remaining GMO free, we need to seriously consider changing our position on the GMO Moratorium.

We also recommend that the timeframe to review the GMO Moratorium be no more than five years. Technologies in gene editing and genetic modification are rapidly changing and therefore our status needs to be reviewed and considered regularly. Markets can also change rapidly and our market advantage of GMO free also needs to be reviewed regularly. We also recommend that market access for Tasmanian GMO products is constantly reviewed, as well as gene technology being used interstate and internationally, and if needed, a review triggered earlier.

Gene editing and GMOs are being utilised globally to the advantage of agricultural industries. Remaining GMO free has the potential to disadvantage Tasmania due to limited access to these technologies that can improve yield, production, efficiency and animal health. However, remaining GMO free provides Tasmanian with a unique opportunity to market our produce to the rest of the world. This is a significant advantage and if utilised correctly, creates benefits to our state.

Therefore, we do support the GMO Moratorium in Tasmania on the condition that it is utilised and marketed correctly. We also recognise that this is a continuously evolving area and believe the moratorium needs to be reviewed regularly and monitored constantly, and if the benefits no longer outweigh the gains, removed.

The TFGA believe the GMO Moratorium is a unique value adding opportunity for Tasmania but needs to be marketed fully and reviewed regularly. We are pleased to be able to provide feedback on the GMO Moratorium review due to its importance to Tasmanian agriculture.

Please contact the TFGA if you require any further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Peter Skillern', with a long horizontal line extending to the left.

Peter Skillern
Chief Executive Officer
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