

Subject: RE: LETTER - Brad Sutherland from Minister Barnett regarding SDN-1 Regulations - Invitation to Comment
Date: Thursday, 21 January 2021 11:40:18 AM

Dear Lesley and Caroline,

Many thanks for the opportunity to review and comment on the draft SDN-1 regulations. While I am sure the University of Tasmania (my employer) has seen and commented on the regulations, my submission here is my own and independent of the University's submission (if they are making one).

I am supportive of the draft regulations, and while I understand the decision of the National Gene Technology Scheme to remove SDN-1 as a GMO due to the process of genetic change being similar to natural mutations, I understand the impact this may have on the agricultural sector and the exportation of material that are thought to be GMO-free. Therefore, I believe SDN-1 should be regulated in Tasmania and am supportive of the draft regulations under the Biosecurity Act 2019. I am also supportive of the registration process for dealings of SDN-1 (whether it be importation or use of SDN-1 material) controlled by Biosecurity Tasmania as outlined in Attachment 2 – SDN-1 Fact Sheet.

An additional point to consider is if and when other jurisdictions (e.g. Japan, China, EU) lift their restrictions on SDN-1 modified organisms (in line with the NGTS in Australia), Tasmania should consider that the exportation of SDN-1 modified organisms to these markets will no longer impact upon the GMO-free status of the exported material. The regulations at this time should then be reconsidered.

Kind regards,

Brad

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