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The Dairy Industry Submission to the Statutory Review of the Gene Technology Act 2000

On behalf of the Australian Dairy Industry Council (ADIC) and Dairy Australia, we welcome this opportunity to provide the dairy industry submission to the review of the current National Registration Scheme for Agricultural and Veterinary Chemicals.

As the national policy body of the Australian dairy industry, ADIC represents the interests of Australian dairy farm families and businesses, dairy manufacturers and traders across all states and territories. Dairy Australia is the industry's owned service body whose members are farmers and industry bodies, including the Australian Dairy Farmers and the Australian Dairy Products Federation.

We are pleased to provide a dairy industry perspective on this current review and look forward to continuing improvement in the national regulatory scheme for managing gene technology.

The dairy industry supports the valuable role of the Gene Technology Act 2000 and the activities of the Office of the Gene Technology Regulator which protects the health and safety of the people and the environment from risks posed by, or as a result of gene technology. The Act provides for a national regulatory framework which is an efficient and effective system to manage the application of gene technologies.

It is unfortunate that despite the Inter-Government Agreement to establish a naturally consistent regulatory scheme in Australia, variation in State Government implementation of legislation related to market and trade access considerations has led to inconsistency and limited the commercial adoption of GM crops. This has also created uncertainty for R & D investment in gene technology. Australia needs a nationally consistent gene technology scheme to provide a predictable and transparent path to market for approved GM crops.

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The dairy industry believes that the regulatory system for gene technology must be science-based with assessments on a case by case basis so that the measures imposed are proportional to risk. The dairy industry commends the work of the Gene Technology Technical Advisory Committee for its scientific rigor in evaluating GM products under development. The consistent and rational approach of the Office of the Gene Technology Regulator ensures that the community can be confident about the safety of approved GM products and not be unduly influenced by unsubstantiated claims of groups opposed to the adoption of GM technology.

The Office of the Gene Technology Regulator has conducted valuable communication and consultation in relation to gene technology R & D and GM products under development. It will be important to provide further communication so that the community recognises that there is a long period involving both experience and research prior to release of GM products. Consequently there should be greater acceptance for approved products and less emphasis that they are new or novel. GM products undergo much greater assessment than conventionally developed counterparts. It is essential that assessments and regulations remain science based and are not needlessly or excessively imposed for GM products.

The Office of the Gene Technology Regulator needs to continue to be cost effective in its operation and transparent in its decision making. Due to the early phase in development of GM products and the long time to realize return on investment from R & D, it is important that the government continues to support the operations of the Office of the Gene Technology Regulator and not place unnecessary costs on R & D providers. These need to be commensurate with potential risk.

The monitoring of international developments and assessment of GM products by the Office of the Gene Technology Regulator has been very effective and critical for Australian agriculture which exports to international markets. Assessment of GM products for both animal feeds and human food is an important consideration.

The dairy industry believes the Gene Technology Act 2000 continues to be appropriate and provides an effective basis for the national regulatory scheme in accordance with its objectives to protect the health and safety of people and the environment. The operation of the Office of the Gene Technology Regulator is supported in the strong scientific basis that is used to underpin the assessments and the regulatory approach.

Yours sincerely



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