



8 November 2024

Gene Technology Implementation Team

National Gene Technology Scheme

Via: gene.technology.implementation@health.gov.au

Re: Proposed amendments to the Gene Technology Act 2000

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to National Gene Technology Scheme's consultation on the proposed amendments to the *Gene Technology Act 2000*.

The NFF is the voice of Australian farmers and was established in 1979 as the national peak body representing farmers and the agriculture sector more broadly, across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

The NFF recognises the potential of gene technology as a valuable tool within agricultural production systems. The responsible and strategic application of gene technology within Australian production systems thus far has resulted in significant benefits for Australian farmers, consumers, the environment, and the economy.

We strongly support the scientific rigour of the National Gene Technology Scheme through which these technologies are regulated. There is great potential to expand the development and use of these technologies to meet future challenges in areas such as human health, agricultural productivity, and environmental sustainability.

To realise potential benefits of gene technology in Australia, we need a regulatory environment that keeps pace with technological change, provides certainty, effectively manages risk, and promotes investment in research and development.

The NFF supports a modernised regulatory environment that is better harmonized with international standards, and which appropriately incentivises the development of new techniques and introduction of products in the Australian market.

Australian farmers are well-placed to responsibly harness the enormous opportunities gene technology offers. Farmers recognise the importance of harmonious co-existence between conventional and organic enterprises, which is critical to ensuring a diverse food and fibre market for consumers.

The NFF acknowledges the need for Australia's gene technology regulation to be updated in line with rapid developments in genetic modification in the last two decades, and believes the proposed risk-tiering approach largely addresses the fundamental needs of industry.

We support the shift to a risk-based approach to better reflect the complex array of gene technologies, as well as the proposed shift in regulatory philosophy to increase responsiveness to ensure new technologies can be quickly included under



the OGTR's regulatory umbrella. However, it is important that OGTR definitions, including for 'gene technology', are harmonised with those adopted by other bodies such as Food Standards Australia New Zealand (FSANZ).

The NFF views the proposed amendments, and the associated drafting of regulations and rules, as an opportunity to provide long-term certainty for innovators and promote the introduction of safe, beneficial products to market.

Simpler, more straightforward regulation – particularly for low-risk products – can reduce obstacles or impediments for entry to market.

Those barriers include lengthy timeframes for approval, and regulatory burden and duplication. It is equally important that any new or emerging products are not over-regulated, including in comparison to international counterparts.

In particular, the NFF strongly supports significantly reducing regulation on GMOs indistinguishable from organisms that have or can be produced by conventional breeding, and thereby have an equivalent level of risk. This includes GMO permits as proposed, and better aligns with emerging international standards.

The NFF notes that details around which gene technologies or GMOs fall under specific proposed authorisation pathways will be a matter for the regulations and rules yet to be drafted or published. We highlight the need for comprehensive engagement and collaboration with industry in the drafting of such regulations and rules, and for clarity around transition planning.

The agriculture industry has already benefited significantly from the application of gene technology over the past two decades and is well-positioned to embrace the transformative opportunities of new and emerging gene technologies.

The harmonisation of Australia's regulatory environment with the international system will also support Australian producers to engage more strongly with new and existing global markets and help to address key challenges such as climate change and health. This would promote improved understanding and transparency and reinforce the world-leading scientific governance Australia boasts.

The NFF thanks OGTR for the opportunity to make a submission on the proposed amendments to the *Gene Technology Act 2000*. The policy contact for this matter is Mr Zac Rayson, Senior Policy Officer (Rural Affairs), via e-mail: zrayson@nff.org.au.

Regards,

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