



Gene Ethics | Mothers are Demystifying Genetic Engineering | FOODwatch WA | SA Genetic Food Information Network
Friends of the Earth, New and Emerging Technology Project | GM-Free Australia Alliance

Comments on Phase 2 Questions for the 2017 Review of National Gene Technology Scheme

Preamble:

This Review of the Gene Technology Scheme inappropriately elevates other irrelevant matters above the core goals and objectives that all the governments of Australia set for the regime in 2000 – exercising precaution to protect human health, safety and the environment. The questions posed in Phase 2 go far beyond the brief to review the existing Scheme.

We contest proposals for radical change to the Scheme and the Regulations. The proponents carry the onus of proof to produce evidence in support of their case for amendments to the Act, Regulations and Intergovernment Agreement. They have failed to make such a case.

We contest the OGTR's provisional finding that some new GM techniques should be deregulated now and reject the GM industry's view that all new techniques may be deregulated.

This Scheme Review appears to accept as a fait accompli the interim findings of the OGTR's Technical Review of the GT Regulations 2001, and seeks to enshrine them in policy. Since the OGTR's review is incomplete and the proposal to adopt Option 3 is strongly contested, many of the Health Department's proposed policy changes are also premature.

Some technical and scientific advisors to the Scheme Review and the Technical Review of the Regulations, and the organisations for which they work, have clear conflicts of interest that should disqualify them from giving advice to the Review Team, the Legislative and Governance Forum on Gene Technology, the Standing Committee on Gene Technology, and the OGTR. The advice offered during parts of the Scheme Review show that they are not dispassionate participants or informants in the review process.

Definitions in the Gene Technology Act are broad and robust and deliberately do not confine themselves to transgenic processes or organisms. So they in no way restrain the Scheme or the OGTR from requiring the Regulation of all present and future new GM techniques and their products.

The reviewers should recommend that the Australian government sign and ratify the Cartagena Biosafety Protocol to the Convention on Biodiversity, to make Australia a full member of the international regime that seeks the safe international transfer, handling and use of GMOs, to protect biodiversity and public health.

The recommendations in public interest submissions on amending the Scheme appear to be ignored in favour of deregulation. When, where and by whom will our submissions be discussed?

The following are our responses to the Phase 2 review questions presented online and in the Phase 2 document.