A submission to the Review of the National Gene Technology Scheme 2017 - Phase 2.

# GM food: What could possibly go wrong?

### Question under consideration:

As new techniques for genetic modification (GM) appear, is it appropriate for the regulator and/or the regulations to exclude the products of some GM techniques from regulation? Should the regulator and/or the regulations maintain a narrow or a broad definition of genetically modified organisms (GMOs)?

#### Response:

Australia's Office of the Gene Technology Regulator (OGTR) needs to maintain a broad and inclusive definition of GM and GMOs to protect the public, the environment, and its own integrity and authority. The GMOs that GM technology creates, whether using current techniques, developing techniques or future techniques, need to continue to be regulated, without further exemptions. Technologies for altering genetic sequences and gene expression (for example) produce GMOs and it is appropriate that they are all regulated. Such GM techniques include, but are not limited to, SDN, SDN-1, SDN-2, ODM, RNAi, and developments include, but are not limited to, gene drives, and synthetic biology.

Broad and inclusive regulation means that GM techniques, by default, fall within the net of regulation.

# Eight reasons why the OGTR needs to maintain a broad and inclusive definition of GM and GMOs:

## 1. Public distrust of GM technology.

There is already a general public distrust of GM technologies. This distrust is global. A recent survey of consumers (N > 23,000) in seventeen countries reported that an important consideration for food choice is that "It is free from GMO (genetically modified) ingredients" (GfK 2017) (Fig. 1).

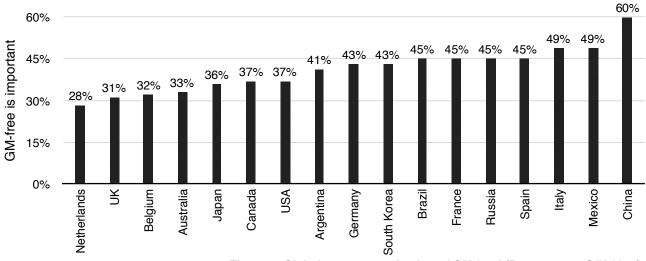


Figure 1: Global consumer rejection of GM food (Data source: GfK 2017).