TASMANIAN BEEKEEPERS ASSOCIATION INC.

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Submission: Gene Technology Amendment Regulations 2026

1. Overview

TBA does not seek in this submission to revisit the policy decision to move to a risk-tiered national framework. However, TBA is concerned that the way the new framework is implemented may have consequences well beyond the scientific risk categories used in the legislation.

For premium food sectors such as honey, market acceptance is not determined solely by regulatory definitions or scientific risk assessments. It is also determined by whether customers, certifiers and importers remain confident in the origin story and provenance claims attached to the product. If that confidence is weakened, the commercial consequences fall on producers and exporters rather than on regulators.

Tasmania's GMO-free status is not merely a regulatory setting. It is a market signal. It helps explain in a simple and credible way why Tasmanian honey is different. TBA members report that customers in markets such as Japan and Germany remain highly sensitive to GMO issues. In those markets, complexity and caveats are a commercial disadvantage.

TBA's central message is this: Tasmania's value lies not in being aligned with national minimum standards, but in maintaining an exceptional premium provenance position that is easily understood and trusted in market. The Commonwealth framework should not, directly or indirectly, erode Tasmania's longstanding GMO-free market position.

TBA's detailed responses to the consultation questions lodged through the consultation hub are attached at Appendix A and should be read together with this submission.

In particular, TBA recommends that the amended Regulations:

- preserve high levels of transparency around the GMO Register, especially for gene-edited plants;
- maintain robust consultation for novel and uncontained dealings and recognise market-confidence risk as a relevant consideration;
- ensure permit pathways for plant field trials include pollination-aware conditions and active notification to potentially affected beekeepers;
- avoid regulatory gaps where risks are said to be managed elsewhere, particularly where no single regulator is responsible for pollen-mediated provenance and market impacts; and
- provide clear and plain-English definitions and explanations so that stakeholders are not left to infer meaning from technical terms alone.

2. About the Tasmanian Beekeepers Association

The Tasmanian Beekeepers' Association Inc. (TBA) is Tasmania's peak industry body for the apiary sector. Founded in 1946, we support all sectors of beekeeping - from backyard hives to commercial operators.

We strengthen the industry through advocacy, practical information and connection: supporting good beekeeping, promoting strong biosecurity, and representing members in discussions with local, state and federal decision-makers.

We work constructively with government, regulators, land managers and partner industries - bringing on-ground experience and evidence to the table.

We provide forums for members and other interested stakeholders through our Annual conference, regular newsletters, and updated information.

3. About the Tasmanian Apiary Industry

Tasmania's apiary industry underpins both honey production and pollination for high-value crops.

The 2025 Tasmanian Beekeeping Survey, undertaken by AgriGrowth Tasmania, reports that in 2023–24:

- There were 42,613 registered hives and 1,867 registered beekeepers; commercial beekeepers owned 32,701 hives (77%).
- The industry produced an estimated 1,200 tonnes of honey, with a farm-gate value of $14.1 million, and a total industry value (including other bee products) of $17.6 million, up 15% from 2020–21.
- 14,869 hives were used for pollination (up 45% on 2020–21), earning $2.8 million in pollination fees and supporting pollination-dependent crops worth up to $400 million.
- At least 70% of honey was produced from flora on public land, reinforcing the importance of apiary access and forest management settings.
- Leatherwood honey remains the signature product of the Tasmanian industry, representing around 70% of production and depending heavily on access to remote rainforest resources on public land.

Complementing this, broader industry analysis submitted to the Agriculture Strategy process estimates that beekeeping and pollination together underpin more than $500 million in agricultural value each year, in addition to approximately $15 million in honey and related products.

When these sector-specific numbers are set against whole-of-agriculture data, the picture is stark:

- In 2023–24, Tasmanian agriculture produced about $2.6 billion in farm-gate value.
- Of that, about $400 million – roughly one dollar in every seven – came from pollination-dependent industries.
- If the State reaches its $10 billion farm-gate target by 2050 and pollination-dependent sectors grow in line with the broader sector, their value will be about $1.2 billion each year, three times today's figure.

So, in very simple terms, bees keep food on the table. If bees fail, crops fail. If crops fail, farmers and processors lose income, regional jobs are lost, and food prices go up.

The Survey also highlights that:

- Survey respondents (54% of all registered hives) collectively employed 85 FTE staff.
- Total registered hives are forecast to increase by around 8% over 2025–26, with some beekeepers explicitly planning to build a "buffer bee population" in case of Varroa and to meet expected pollination demand.

The Tasmanian apiary industry is therefore a relatively small stand-alone industry, but it underpins a critical component of productive infrastructure for the wider agri-food system.

4. Why this matters to Tasmanian beekeepers

Tasmania's beekeeping industry relies heavily on provenance. The State's clean and differentiated position supports premium marketing for honey, beeswax, and value-added hive products. That premium is not secured simply by production quality; it is reinforced by the story Tasmania can credibly tell about what it excludes as well as what it produces.

In practical terms, any softening or complication of GMO language at the national level can create downstream commercial effects for Tasmanian producers, even where the scientific risk is assessed as low. A single buyer query may trigger requests for clarification, additional testing, changed product descriptions, revised labels, or extra assurance steps.

These costs are real. They are borne by beekeepers, packers and exporters.

TBA is particularly concerned that a framework designed primarily around biological risk may understate the significance of market-confidence risk. Honey, pollen movement, and bee foraging behaviour create pathways that are different from plant-centric assumptions about containment.

A measure that appears technically confined in regulatory terms may still have consequences for provenance claims and customer perception.

5. Specific comments on the proposed amendments

5.1 Overall approach

TBA accepts the intent of a more proportionate, risk-tiered regulatory framework. However, proportionality should not be achieved at the expense of transparency or trust. Regulatory efficiency is important, but for premium agricultural sectors the maintenance of confidence is equally important.

The proposed amendments should therefore be assessed not only against scientific and administrative criteria, but also against whether they preserve the clarity of Australia's and Tasmania's product narratives in sensitive domestic and export markets.

5.2 GMO Register and gene-edited plants

TBA considers the proposed use of the GMO Register for certain gene-edited plants to be one of the most commercially significant aspects of the package. Even where the scientific rationale for inclusion is clear, Register inclusion changes language and perception in ways that matter to buyers and certifiers.

Many buyers and certifiers will not distinguish in practice between terms such as cisgenic, gene-edited, or GMO listed on a national register.

The more likely reaction in sensitive markets is a simpler and less favourable one: if Australia allows GM plants under a broader framework, contamination risk may be assumed to exist. That perception can make honey and other hive products harder to defend as GMO-free, even where legal or technical arguments remain available.

For this reason, TBA strongly recommends that any Register inclusion for gene-edited plants be accompanied by clear plain-English explanations of what the inclusion does and does not mean, and by consultation processes that allow affected industries to understand the practical implications for downstream product claims.

TBA also recommends that the Commonwealth expressly recognise that Register settings should not weaken or blur downstream product claims for honey, beeswax, pollen or other hive products.

5.3 Permit pathway for plant field trials

TBA supports a permit pathway for plant field trials only where the conditions are robust, enforceable, visible, and practically designed for real-world exposure pathways.

A key concern for the beekeeping industry is that field trial conditions can be overly plant-centric. What may appear contained for crop management purposes is not necessarily contained for bees. Pollination-mediated exposure, flowering periods, foraging radius, and pollen movement all have the potential to create market risk for honey, whether that risk is biological, perceived, or both.

TBA therefore recommends that permit conditions for plant field trials explicitly address pollination-aware issues, including consideration of nearby apiary density, active notification to potentially affected beekeepers, assessment of flowering periods and bee foraging behaviour, and monitoring measures proportionate to the risk of downstream impact on honey provenance.

5.4 Consultation triggers and confidence risk

TBA is concerned that a risk-based consultation model may focus too narrowly on environmental and health risk and give insufficient weight to commercial and confidence impacts. For premium food products, confidence risk is immediate and material. Once definitions soften, marketing claims are more readily challenged. Once claims are challenged, premiums erode.

The consultation framework should therefore not assume that low biological risk equates to low market consequence.

TBA recommends that the Regulations and associated guidance recognise market-confidence risk as a legitimate factor in deciding when broader consultation is warranted. This is particularly important for novel or non-contained dealings, and changes that may materially affect provenance claims or customer perception.

5.5 Risks said to be managed elsewhere

TBA supports sensible efforts to avoid duplication between regulators. However, there is a real risk that impacts spanning multiple sectors may be managed nowhere in practice if each regulator assumes another will deal with them.

This is especially relevant for apiculture. No single regulator is clearly responsible for pollen-mediated provenance risk or for the commercial consequences that arise when buyers question GMO-free claims. The Gene Technology framework should therefore retain sufficient discretion to consider broader impacts where necessary, rather than excluding them on the assumption that another scheme will pick them up.

5.6 Tasmania's exceptional market position

Tasmania does not compete in premium honey markets on volume, price or proximity. It competes on distance, discipline, and the maintenance of harder lines than many other producing regions. That exceptional position is commercially powerful because it is simple to explain. If Tasmania becomes just another origin with qualifications and footnotes, the value of that differentiation diminishes.

6. Recommendations

TBA strongly argues that national reforms should not place Tasmania in a position where it must rely on technical caveats, legal distinctions or complex explanations to defend the integrity of its premium provenance story. On that basis, and for the reasons outlined above, TBA recommends that the amended Regulations and associated guidance:

- Maintain strong transparency and consultation around the GMO Register, including for any gene-edited plants proposed to be listed.
- Provide plain-English explanations of technical terms and clear public communication about what Register inclusion does and does not mean for downstream food chains and product claims.
- Ensure permit conditions for plant field trials include pollination-aware requirements, including active notification to potentially affected beekeepers where appropriate.
- Recognise market-confidence risk as a relevant consideration in consultation settings and regulatory decision-making.
- Retain discretion to consider broader or cross-sector impacts where those impacts are not clearly addressed elsewhere.
- Ensure that low-burden pathways do not inadvertently reduce confidence in Australia's and Tasmania's premium product narratives.

7. Conclusion

TBA appreciates the opportunity to comment on the proposed Gene Technology Amendment Regulations 2026.

Our submission does not oppose proportionate regulation in principle. Rather, it asks that the amended framework be designed in a way that respects the commercial realities of premium food production and the particular importance of Tasmania's GMO-free positioning to the beekeeping industry.

The strongest and most durable regulatory framework will be one that is scientifically sound, transparent in operation, and sufficiently alert to the market-confidence consequences that arise when product narratives become harder to defend. For Tasmanian honey and hive products, that is not a peripheral issue. It is central to value.

Appendix A – Consultation Questions and TBA Responses

Please note: The numbering and wording of questions in this appendix follow the consultation hub transcript to preserve alignment with TBA's lodged survey response.

1. **Do you have any comments or concerns with regards to the proposed changes to the structure of the GT Regulations generally?**

TBA Response:

TBA has no objection to changes to the structure of the Gene Technology Regulations where these are administrative or machinery changes intended to support the new risk-tiering framework. However, because the proposed framework is complex and introduces new authorisation pathways, classes and terminology, it is important that the final Regulations remain clear, navigable and transparent for stakeholders who are not regulatory specialists.

In particular, TBA encourages the Department to ensure that:

- the structure is supported by clear explanatory material and plain-English guidance
- stakeholders can easily understand how current provisions map across to the new framework
- the new structure does not reduce transparency about which dealings are subject to consultation, notification, permit conditions or inclusion on the GMO Register.

For TBA, clarity matters not only for regulatory comprehension, but also because changes in classification and presentation can have real market consequences for sectors such as beekeeping that rely on Tasmania's longstanding GMO-free premium market position. Even where the scientific or regulatory intent is unchanged, structural changes that make the system harder to understand may undermine confidence among producers, buyers and consumers.

3. **Do you consider that any other terms are unclear and/or require definition?**

TBA Response:

TBA considers that several terms would benefit from clearer definition and/or plain-English explanation in the final Regulations or accompanying guidance.

In particular, we suggest clearer definitions or explanatory material for:

- gene-edited plants – especially the criteria for inclusion on the GMO Register and how these are intended to differ from other GMOs in practice
- cisgenic
- deletions
- T-DNA / naturally occurring T-DNA sequences
- the expression "not involving intentional release into the environment"

These terms may be meaningful to specialists, but they are not necessarily well understood by producers, downstream industries, consumers or export markets.

For TBA, this matters because regulatory terminology does not stay confined to the regulatory system. Terms used in the framework can influence how buyers, certifiers and the public interpret whether a product or production landscape is still genuinely "GMO-free".

TBA is particularly concerned that, without clear definitions and plain-English explanation, concepts such as "gene-edited", "cisgenic", or inclusion on the GMO Register may be treated by markets as effectively equivalent to "GMO", regardless of the scientific or legal distinctions. That creates potential market-confidence risks for sectors such as beekeeping that rely on Tasmania's longstanding GMO-free premium position.

TBA therefore encourages the Department to provide both:

- clear technical definitions in the Regulations where needed; and
- plain-English explanatory guidance that makes clear what those terms do, and do not, mean in practice for food chains, downstream products and market claims.

4. **Are stakeholders satisfied with the proposal of certain risks being excluded from the requirement of ministerial and Regulator consideration if they are already considered under another scheme?**

TBA Response:

TBA supports the objective of avoiding unnecessary duplication where particular risks are already being appropriately assessed and managed under another regulatory scheme. In principle, that is sensible.

However, TBA's concern is that the proposed approach must not create situations where risks that matter in practice are assumed to be covered elsewhere, but are in fact not fully considered by any regulator. This is particularly important for impacts that may not fit neatly within a single scheme, including market-confidence, provenance and downstream product impacts.

For the beekeeping industry, the issue is not only biological or food safety risk. A dealing may be considered low risk, or adequately managed under another scheme, yet still create significant consequences for:

- Tasmania's longstanding GMO-free premium market position
- provenance claims for honey and hive products
- buyer, exporter and consumer confidence
- practical issues arising from pollen movement and pollination pathways.

TBA therefore considers that the mechanism in proposed section 15A may be suitable only if it is applied cautiously and with sufficient discretion. It should not operate as a blanket exclusion that prevents the Minister or the Regulator from considering broader risks where this is warranted.

In particular, TBA suggests that:

- the mechanism should be used only where the other regulatory scheme clearly and directly addresses the relevant risk

- there should be capacity for the Regulator and/or Minister to consider additional matters where there is a risk of regulatory gaps
- the framework should recognise that some impacts, especially market and confidence impacts, may fall between regulatory schemes if they are not expressly considered.

In short, TBA supports coordination between regulatory schemes, but not at the cost of creating blind spots. From our perspective, the risk is that matters managed "elsewhere" can too easily become matters managed nowhere.

5. **Do you consider the concept of a designated dealing clear?**

TBA Response:

In general, the concept of a designated dealing is reasonably clear. TBA understands the policy intent to identify certain dealings as unsuitable for lower-burden pathways and to ensure they remain subject to higher scrutiny.

That said, clarity will depend heavily on how the concept is explained in practice and how consistently it is applied across the framework. For stakeholders outside the regulatory system, the term itself is not especially intuitive, so clear explanatory material will be important.

From TBA's perspective, the key issue is that the designated dealing category should operate conservatively and transparently for dealings with the potential for broader environmental, market or confidence impacts.

In particular, it is appropriate that high-consequence technologies, such as gene drive organisms, be clearly captured within the highest scrutiny settings.

TBA therefore considers the concept broadly clear, but recommends that:

- the final Regulations and guidance include a plain-English explanation of what makes a dealing "designated"
- examples be provided to show why a designated dealing cannot proceed under lower pathways
- the category be applied cautiously where the consequences of error or public concern would be significant. In this context, clarity is important not only for regulatory certainty, but also for public and market confidence.

6. **Do you have any concerns with the proposed consultations process for the RARMPs?**

TBA Response:

TBA supports a risk-based consultation process for RARMPs in principle. However, we do have concerns if the practical effect of the proposed changes is to reduce transparency or narrow consultation too far, particularly for dealings that may have important market, environmental or confidence implications beyond the immediate technical risk assessment.

For TBA, the issue is not simply whether a dealing is scientifically assessed as low risk.

In Tasmania, industries such as beekeeping operate within a premium provenance and GMO-free market context, and confidence can be affected by regulatory decisions even where direct biological risk is considered limited.

Our concerns are therefore:

- that the consultation triggers may be too narrowly framed around technical or biological risk alone
- that dealings capable of affecting public confidence, export market perception or downstream provenance claims may proceed with limited external visibility
- that consultation may become more difficult for affected sectors if the new framework is less transparent or less intuitive to navigate.

TBA considers that consultation settings should remain strong for:

- novel or higher-risk GMOs
- dealings outside containment or involving intentional environmental release
- dealings that may attract significant community, market or cross-sector interest.

We also encourage the Department to ensure that the consultation process remains accessible to stakeholders who are not regulatory specialists, including through plain-English supporting material and clear notice of relevant applications.

In short, TBA does not oppose a risk-based consultation model, but it should not be implemented in a way that unintentionally weakens confidence. For sectors like beekeeping, market-confidence risk can be a real consequence even where biological risk is assessed as low.

7. Do you have any concerns with revised timeframes?

TBA Response:

TBA has no major concerns with the proposed revised timeframes, provided they remain sufficient to support rigorous assessment, meaningful consultation and clear decision-making.

From our perspective, it is appropriate that more complex or higher-consequence dealings have longer timeframes where needed. A more streamlined approach for genuinely lower-risk dealings is also understandable, so long as this does not come at the expense of transparency or careful scrutiny.

TBA's main concern is not the timeframes themselves, but that time efficiency should not override confidence, clarity or consultation. In particular, longer timeframes are justified where dealings are novel, outside containment, environmentally significant, or likely to have broader market or community implications.

In short, TBA is broadly comfortable with the revised timeframes, but considers that the framework should continue to prioritise robust assessment over speed where the consequences of error, uncertainty or loss of confidence may be significant.

8. **Do you have any concerns around the proposed range of dealings that will be required to be licensed?**

TBA Response:

TBA's main concern is that the proposed range of dealings requiring a licence must remain broad enough to ensure that dealings with potentially significant environmental, market or confidence impacts are not inappropriately channelled into lower-burden pathways.

We understand and support the objective of creating a more proportionate framework. However, for TBA the key issue is that a dealing may be regarded as relatively low risk in a narrow technical sense, while still having meaningful consequences for:

- Tasmania's longstanding GMO-free premium market position
- provenance claims for honey and hive products
- buyer and consumer confidence
- practical pollination and pollen movement pathways.

For that reason, TBA is concerned that the licensing threshold should not become too narrow or overly dependent on biological risk alone. Where a dealing is novel, has the potential for dissemination outside containment, may interact with production landscapes, or is likely to attract significant public or market concern, a licence remains the more appropriate and confidence-supporting pathway.

TBA therefore encourages the Department to ensure that:

- the licensing category continues to capture dealings with meaningful potential for broader consequences
- lower pathways are not used where there is uncertainty about environmental spread, downstream impacts or public confidence effects
- the framework errs on the side of stronger oversight where the consequences of error could be difficult to reverse.

In short, TBA supports a risk-proportionate system, but not one that narrows the licensing category so far that significant real-world consequences are underestimated.

7. **Do you have any concerns with dealings that are proposed to be authorised by a GMO permit?**

TBA Response:

TBA has concerns if the GMO permit pathway is used for dealings that appear administratively simple but may have broader real-world consequences, particularly for plant field trials.

In principle, TBA understands the case for a permit pathway for defined classes of dealings. However, our concern is that permit conditions can become too plant-centric and may understate the significance of pollination pathways, pollen movement and downstream provenance impacts for industries such as beekeeping.

For TBA, the key issue is that a field trial may be assessed as low risk from a narrow regulatory perspective, while still creating practical and commercial consequences for:

- honey provenance claims
- buyer and consumer confidence
- nearby apiaries and beekeepers
- Tasmania's longstanding GMO-free premium market position.

TBA therefore considers that dealings authorised by GMO permit should only proceed where permit conditions are robust, enforceable and transparent. In particular, for plant field trials, the framework should consider:

- flowering periods
- bee foraging behaviour and pollen movement
- proximity to apiaries and apiary density
- post-trial monitoring requirements
- clear and proactive notification to potentially affected landholders and beekeepers.

TBA is especially concerned that a standard permit model may underestimate the way bees interact with production landscapes. A trial that appears contained from a crop-management perspective may not be perceived as contained from the perspective of pollination and market assurance.

In short, TBA does not oppose a GMO permit pathway in principle, but considers that it must be applied cautiously, with conditions that reflect pollination-aware risk management and the need to maintain public and market confidence.

8. Do you have any concerns in relation to the proposed notifiable dealings classes?

TBA Response:

TBA has no objection in principle to the use of proposed notifiable dealings classes for dealings that are genuinely low risk and suitable for a lighter-touch pathway.

However, TBA's concern is that the notifiable dealing framework must not reduce transparency to the point where stakeholders, downstream industries and the public lose visibility of matters that may still have practical or market significance. For sectors such as beekeeping, the issue is not only whether a dealing is technically low risk, but whether it may affect confidence in Tasmania's longstanding GMO-free premium market position and the provenance claims associated with honey and hive products.

TBA therefore considers that notifiable dealings are only appropriate where:

- the class boundaries are clear and conservative
- notification and record-keeping requirements are robust
- there is sufficient transparency to allow stakeholders to understand what is occurring and where relevant dealings may intersect with production landscapes or market claims.

In particular, TBA would be concerned if notifiable dealings were used for activities that rely heavily on the assumption that risks are managed elsewhere, but where practical downstream consequences — including pollen movement, provenance issues or market perception — may still arise.

In short, TBA supports the concept of notifiable dealings for genuinely low-risk classes, but only where the framework preserves adequate visibility, accountability and confidence.

9. Do you have any concerns in relation to the proposed non-notifiable dealings classes?

TBA Response:

TBA has no objection in principle to proposed non-notifiable dealings classes for activities that are genuinely very low risk and appropriately confined.

Our concern is that this pathway should remain tightly limited and clearly defined. Because non-notifiable dealings involve the least visible level of regulatory oversight, there is a risk that activities may be treated as administratively insignificant even where they could still give rise to misunderstanding, concern or downstream market consequences if class boundaries are drawn too broadly.

For TBA, visibility matters. Tasmania's beekeeping industry operates within a premium provenance and GMO-free market context, and confidence can be affected not only by biological risk, but also by how regulatory categories are perceived by buyers, certifiers and the public.

TBA therefore considers that non-notifiable dealings are only appropriate where:

- the activities are clearly and genuinely low risk
- they remain within strict and well-defined boundaries
- there is no realistic prospect of environmental dissemination, interaction with production landscapes, or confusion about downstream implications
- the class definitions are not expanded over time without proper scrutiny and consultation.

In short, TBA does not oppose the use of non-notifiable dealings classes, but considers that they must remain a narrow and carefully controlled category if public and market confidence is to be maintained.

10. Do you consider the language 'not involving intentional release into the environment' appropriate for NNDs?

TBA Response:

TBA considers the phrase "not involving intentional release into the environment" to be broadly appropriate, but it would benefit from clearer explanation or guidance to avoid ambiguity in practice.

Our concern is that the phrase may be interpreted differently by different stakeholders, particularly where an activity is not intended to involve release, but where there remains some possibility of escape, spread or indirect environmental interaction. For industries such as

beekeeping, that distinction matters because production systems interact with the landscape in ways that may not always align neatly with a narrow containment concept.

In particular, TBA suggests the Department clarify:

- what is meant by "intentional release"
- how the concept applies where there is no planned release, but some possibility of unintended escape or environmental exposure
- how this wording is intended to operate in relation to organisms, plant material or pollen that may move beyond an immediate site or controlled setting.

TBA's interest here is not only regulatory precision, but also confidence. If the wording is too open to interpretation, stakeholders may struggle to understand the practical boundary between contained dealings and those that warrant greater oversight.

In short, TBA considers the language acceptable as a starting point, but it should be accompanied by clear definition, examples, and plain-English guidance so that the category remains genuinely narrow and well understood.