

14 June 2011

GTMC Secretariat  
Department of Health and Ageing  
MDP 138  
GPO Box 9848  
CANBERRA ACT 2609

To whom it may concern,

Re: 2011 Review of the Gene Technology Act 2000

The NFF is the peak national body representing farmers and, more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF. Through an associate category the NFF's membership also encompasses a broader cross section of the agricultural sector to become members of the NFF, including organizations in the agricultural supply chain.

Australian farming is world-leading and internationally-competitive. Australian farmers increased the real gross value of production from \$10.6 billion in 1960-61 to \$41.8 billion in 2008-09<sup>1</sup>. Australian farmers have maintained our competitive position by accessing and adopting new technologies to achieve productivity and efficiency gains. This has enabled Australian agriculture to stay a step ahead of our competitors, returning average productivity growth of 2.8%-a-year over a 30-year period. Key to this productivity growth has been the integration of new knowledge and technology into farming systems<sup>2</sup>.

Australia exports 60% (in volume) of its total agricultural production. In terms of value, this represents around 76% of the total gross value of Australian agricultural production. In 2008/09 Australia's farm exports earned the country \$32.1 billion, despite a significant drought<sup>3</sup>. These exports were achieved as a consequence of the productivity and efficiency of the farming systems used in Australia. Whilst exports of agricultural produce make a significant contribution to the Australian economy, Australian farmers produce almost 93% of Australia's daily domestic food supply<sup>4</sup>.

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<sup>1</sup> Australian Bureau of Statistics, Value of Principal Agricultural Commodities Produced 2008/09

<sup>2</sup> Australian Government Productivity Commission, Trends in Australian Agriculture 2005

<sup>3</sup> ABARE, Australian Commodity Statistics, 2009 and Australian Government Department of Agriculture, Fisheries and Forestry, At a Glance, 2010

<sup>4</sup> Australian Government Department of Agriculture, Forestry and Fisheries, Australian Food Statistics 2007

Genetically Modified (GM) crops are one of the technological advances that will assist Australian farmers in maintaining their competitiveness in both the International and Australian market place. The NFF recognises the potential of biotechnology (including gene technology) as a valuable tool within agricultural production systems, and these technologies are being applied both in Australia and Internationally. The responsible and strategic application of biotechnology within Australia's production systems will result in significant benefits for Australian farmers, the environment, consumers and the Australian economy as a whole.

The NFF advocates that Australian farmers should have the opportunity to adopt production methods best suited to their business and production system needs, be that the use of GM crops and/or the use of conventional, organic or any other practices. The NFF has also strongly supported the principle that the production decisions of one farmer should not unreasonably impinge on the ability of another farmer to meet the requirements and expectations of their chosen market.

The NFF notes that the objective of the Act is to protect the health and safety of people and the environment from risks posed by, or as a result of, gene technology by identifying those risks and managing them by regulating certain dealings with genetically modified organisms (GMOs). The Act establishes a regulatory framework through which its object is to be achieved and the Office of the Gene Technology Regulator (OGTR) has responsibility for the regulation of gene technology.

The NFF believes that the Gene Technology Act (2000) provides for transparent and science-based regulation, and that this is successfully supported through the work of the OGTR. The Gene Technology Act (2000) and the work of the OGTR support the opportunity for Australian farmers to make choices about the types of production systems they use and give agricultural industries, the Australian public as well as Australia's export markets confidence in Australian produce and Australian production systems. The NFF also supports the OGTR's use of experts with agricultural production knowledge on its Statutory Advisory Committees, specifically the Gene Technology Ethics and Community Consultative Committee (GTECCC), which ensures that the OGTR accesses relevant and informed advice. The NFF supports the ongoing operation of the OGTR and the intent of the Gene Technology Act (2000).

The NFF does not have quantitative evidence regarding the cost of the regulatory burden imposed through Gene Technology Act (2000) and the work of the OGTR. However, it seems likely that the inconsistencies between State Governments implementing legislation around market and trade or market access considerations for GM crops present greater difficulties and costs for industries than those that result from the Gene Technology Act (2000) and the work of the OGTR. In addition to their inconsistent approaches the State based frameworks tend to lack transparency and appear not to recognise the work that has been undertaken through the OGTR.

Australian farmers and the agricultural industries see the costs of this inconsistency and lack of transparency in the costs associated with dealing with the inconsistent regulation,

difficulties and costs in managing cross-border operations as well as the forgone opportunities from accessing technologies that might assist their farm operations. Australian farmers are also aware that this inconsistency may influence the decisions of invest in research to develop new plant varieties in Australia that are suited to Australian conditions, or bring technologies developed overseas to the Australian market.

In summary the NFF has confidence in the Gene Technology Act (2000) and the work of the OGTR. However, difficulties exist in the interface between Gene Technology Act (2000) and other Acts and schemes in Australia which has generated a regulatory burden for the Agricultural industries.

Yours sincerely



**MATT LINNEGAR**  
Chief Executive Officer