



14 December 2016

Dr Raj Bhula
Gene Technology Regulator
Regulations Review
Office of the Gene Technology Regulator
GPO Box 9848
Canberra ACT 2601

Dear Dr Bhula

Re: Options for regulating new technologies

The Australian Oilseeds Federation (AOF) is the peak industry body for the Australian oilseed industry, with membership spanning the oilseed value chain from seed breeders and sellers, producers, handlers, crushers, oil and meal processors, and exporters.

The AOF welcomes the opportunity that new breeding technologies can bring to oilseed production, and recognises that appropriate regulatory framework(s) are required to support the ongoing use and further development of this technology. The AOF believes that appropriate regulatory framework(s) should be based on scientific and evidence based risk assessment.

In recognising the need for appropriate regulatory framework(s), the AOF believes that to be effective, regulation requires enforcement. In this respect, one of the core aspects of some of the new breeding technologies is that the end product can be indistinguishable to product that has not been subject to new breeding techniques. Regulation around such occurrences/processes can result in attempting to manage something that can not be measured. Furthermore, from a risk perspective, if the end product from new breeding techniques is identical or indistinguishable from the results from alternate/traditional breeding techniques (which have been used for many years) the risk (and regulatory framework) would have to be equivalent to that of the alternate/traditional breeding techniques (i.e. low/no deemed risk with no regulatory framework).

Consequently, **the AOF supports Option 4**, i.e a regulatory framework which excludes certain new technologies where the end product is indistinguishable from the outcome from more traditional breeding techniques.

In addition, Option 4, as represented in Figure 2 of the discussion paper removes the ambiguity that could exist between SDN 2/ODM and SDN 3 technologies, and provides clarity and certainty for oilseed researchers, breeders and traders as to the regulatory framework within which they are operating.

Finally, and importantly, it appears that major oilseed trading nations, in particular the US and Canada are considering (and in some case, have decided) that new breeding techniques should be considered under a



regulatory regime aligned to Option 4 in the OGTR paper. Alignment of major *grain exporting* nations around appropriate regulatory regimes for new breeding technologies assist in establishing a sound, rigorous and defensible position which in turn can assist major *grain importing* nations in arriving at a similar position for treatment of new breeding technologies.

In conclusion, the AOF submits that Option 4 is the most appropriate Option from those presented, as it provides for:

- Appropriate enforcement of regulations (i.e. enforce what can be measured)
- Certainly for researchers, breeders and traders (i.e. clarity around regulations that apply)
- Alignment with major grain exporting nations. (i.e. providing a sound base for others to follow)

Yours sincerely,

A handwritten signature in blue ink, which appears to read 'Nick Goddard', is positioned below the closing text.

Nick Goddard
CEO
Australian Oilseeds Federation Inc.