



Australian Oilseeds Federation Inc.

31 March, 2022

Dr Raj Bhula
Gene Technology Regulator
MDP 54
GPO Box 9848
CANBERRA ACT 2601

By email: ogtr@health.gov.au

Dear Dr Bhula

RE: REG-003; A PROPOSAL TO INCLUDE DEALINGS WITH GM CANOLA (GT-73) ON THE GMO REGISTER

The Australian Oilseeds Federation Inc. (AOF) is the peak industry body for the Australian oilseeds industry and was established in 1970 to represent the common interests of all Australian oilseed industry participants and to promote the development, expansion and improvement of Australian oilseed production, processing and trading.

The AOF welcomes the opportunity to provide a response to the RARMP on the consideration to include GT 73 canola on the GMO Register, acknowledging that this trait has been available for commercial use by canola growers under licence since 2008.

During this time, the industry has successfully grown and developed the GM sector, such that it now accounts for approximately for 27% of the total area planted to canola.¹ The industry has also been able to effectively manage the growth of GM canola in line with the Market Choice principles developed at the time of the introduction of GM canola. This has underpinned the proven and effective segregation within the supply chain ensuring the the market has been able to trade and process canola of the genetic makeup required by the end user.

In assessing the implications of the addition of the Bayer trait GT 73 (MON 00073-7) on the OGTR Register, the AOF has considered the market implications of this development for both the domestic and international market. To allay any concerns of misinterpretation by the market of addition to the Register, and avoid risks that the market may see this as 'complete deregulation' of GM canola in Australia (and thus loss of Market Choice), the AOF will undertake to communicate to the market the implications of addition to the Register, if the OGTR places this trait on the Register. Key messages would focus on the retention of Market Choice (segregation) by the supply chain to ensure market needs will continue to be met.

The AOF notes the intention of Bayer to cease stewardship surrounding this trait after a period of two years. The practice of stewardship has been critical to the successful expansion of GM canola in Australia, and while

¹ Share of 2021 National area planted.



we understand no conditions (such as stewardship) can be applied by the OGTR if the trait is placed on the Register, we highlight the critical nature of the element of stewardship. The AOF will be consulting with other industry bodies (such as ASF, GTA, etc) if this trait is placed on the Register to assess how best to address this issue.

In conclusion, the AOF does not object to the inclusion of the Bayer trait GT 73 (MON 00073-7) on the OGTR Register, and views this as a natural progression in the acceptance of GM technology, noting the other issues above that will need to be addressed.

Yours sincerely,

A handwritten signature in blue ink, which appears to read 'Nick Goddard', is positioned above the typed name.

Nick Goddard
CEO
Australian Oilseeds Federation Inc.