1 May 2000

Ian Dundas
Standing Committee on Primary Industries and Regional Services
House of Representatives
Parliament House
CANBERRA ACT 2600

Dear Mr Dundas

Thank you for your letter of 1 February 2000 to Mr Paul Hickey concerning the inquiry into primary producer access to gene technology. Your letter has been referred to me for the coordination of a response.

I would first like to apologise for the considerable delay in replying to your letter. I assure you that AQIS is committed to providing every assistance to the House of Representatives Standing Committee on Primary Industries and Regional Services and will take all necessary measures to ensure that there is no recurrence of such a delay in responding to requests from the Committee.

In relation to the issues raised in your letter, I trust that the information below provides the clarification sought.

Assessment Procedures for Imported Genetically Modified Material

AQIS conducts risk assessments on imported genetically modified (GM) plants to identify and manage any associated quarantine risks. The assessment of GM plants by AQIS is conducted on a case-by-case basis but which typically involves consideration of factors such as:

- the nature of the unmodified species into which DNA is inserted
- the origin and function of the inserted DNA
- the physical characteristics and behaviour of the traits expressed in the GM plant
- the end use of the GM plant.

Assessments of GM plant import applications are broadly comprised of three components:

1. The AQIS risk assessment process for all plants (GM and non-GM) firstly involves consideration of whether the species is already present in Australia. Species not present in Australia must be assessed for their potential to become a weed in Australia. This assessment is conducted using the AQIS Weed Risk Assessment (WRA) system A brief description of the WRA system is provided (Attachment A).
2. For plants that pass the WRA system, AQIS implements appropriate quarantine conditions applied to manage the associated pest risks. Again, this part of the assessment process applies to both GM and non-GM plants. Typically, the quarantine conditions for unmodified forms of a plant will be applicable to a GM plant of the same species due to the similarity of pest profiles.
3. The third part of the assessment is specific to GM plants and evaluates any quarantine risks arising from the genetic modification. Genetic modifications which receive particularly close scrutiny are those that confer the following attributes:
    - herbicide tolerance/resistance
    - expression of toxic substances
    - enhanced tolerance to unfavourable environmental conditions (*e.g.* low rainfall, poor soils)
    - enhanced growth characteristics (*e.g.* increased seed production)
    - enhanced pest (including disease) tolerance/resistance.

The attributes listed above essentially increase the probability of a GM plant posing a weed risk. In addition to the quarantine risks directly associated with the growth characteristics of a GM plant, a second aspect that is assessed by AQIS relates to the potential for the gene flow transfer of weedy traits from a GM plant to close relatives. Factors of particular relevance to this aspect of the assessment include:

- the presence of wild relatives
- the frequency of outcrossing
- the level of sexual compatibility
- the viability of resultant seed.

Where quarantine risks are identified at each stage of the assessment process, AQIS determines whether existing management options can be applied to manage these risks or whether new management options may be developed and applied to manage the risks. The end-use of the material modifies the level of risk and influences the nature of the quarantine management options that are applied.

AQIS's assessments of GM plants are restricted to imported material that is nominated by the importer as being genetically modified. Furthermore, AQIS's assessments are limited to quarantine risks only.

Until very recently, AQIS had one staff member primarily responsible for GM risk assessments. This staff member possessed a PhD in molecular biology and research experience in the field. As this person has recently indicated his intention to resign from AQIS, recruitment action is underway.

Certification of Organic Produce for Export

With regard to AQIS's implementation of the recommendations arising from the European Commission Mission Report on Organic Farming in Australia, I am pleased to advise that AQIS has fully implemented all of the Commission's recommendations. The European Commission review team carried out its review in March 1999 and made eight recommendations. AQIS formally responded to the Commission in June 1999 accepting all of the Mission Report's recommendations.

Since that time, AQIS, in partnership with the Australian organic industry, has implemented the measures necessary to bring the recommendations of the Mission Report into practice.

AQIS provided the Commission with a detailed report on how it had implemented those recommendations (Attachment B) in November 1999 and we have been advised that this was accepted by the Commission. As a result, Australia has maintained its market access for organic agricultural produce to the European Union.

I trust that this information provides sufficient clarification of AQIS's roles, procedures and progress in relation to these matters. Once again, I would like to apologise for the delay in providing this information.

Yours sincerely

Digby Gascoine
Director
Policy and International Division