



11 April 2007

COMMUNITY AFFAIRS COMMITTEE
PARLIAMENT HOUSE
CANBERRA ACT 2600

Dear Committee

Gene Technology Amendment Bill 2007

The Victorian Farmers Federation (VFF) is pleased to be able to provide comment on the Gene Technology Amendment Bill 2007 to the Selection of Bills Committee. The VFF strongly supports the original *Gene Technology Act 2000* and welcomes the proposed amendments contained within the *Gene Technology Amendment Bill 2007*.

However, even though the VFF supports the amendment bill we wish to raise the following points which we believe should be taken into account when implementing the recommendations.

Part 1: Emergency dealing determinations

The VFF recognises the importance of providing provisions for the Minister/OGTR to expedite the approval of a GMO in an emergency but emphasise that in all cases the same due diligence which other GMOs and conventional organisms are subjected to must be applied. This will ensure continued confidence in the system that a release will not have a long-term far reaching impact once the emergency has past.

Part 2: Creation of Gene Technology Ethics and Community Consultative Committee

Combining the Gene Technology Technical Advisory Committee and Community Consultative Committee is a natural progression in providing greater links between risk communication and community consultation of intentional release license applications. The new committee can overcome the current impasse of minor interest groups opposing any form of GM by selecting committee members who are forward looking and take each application based on its scientific merits. Committee members must be completely impartial and review each application on a case by case basis.

However, greater due diligence must be undertaken in the appointment of committee members to ensure they do truly represent an accurate representative sample of the community. Organisations that nominate representatives for appointment to the committee must be officially constituted, have a funding process which is completely transparent and be Australian member based with a structured democratic process. It must be made clear what portion of the community the committee member and their organisation represents.

Part 6: Inadvertent Dealings

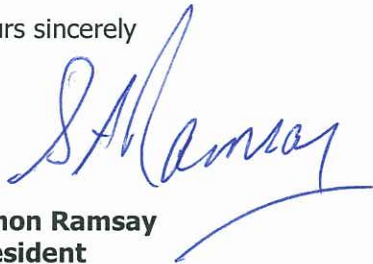
The VFF strongly supports this recommendation, no individual should be penalised for inadvertently dealing with an unlicensed GMO. In 2005 several Victorian grain producers were found to be inadvertently propagating GM canola. This created undue duress and anxiety among those growers due to the uncertainty they faced before the current legalisation. It led to action by the State Governments to introduce adventitious presence tolerance levels of 0.9 percent within Australia. This recommendation strengthens the certainty of dealing with such occurrences into the future.

The VFF strongly supports any new crop, variety or alternative that passes the stringent regulatory process, is commercially proven and offers the farmer greater choice, especially whilst diminishing agriculture's environmental footprint.

We want to reiterate that farmers should have the right to choose what technologies are used in their production system. Just as farmers have the right to choose organic production systems, they should have the right to accept, or reject, genetically modified organisms, which have been endorsed by the responsible Australian regulatory authorities.

These recommendations further strengthen a regulatory system for biotechnology that is second to none in the world.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'S Ramsay', with a long horizontal flourish extending to the right.

Simon Ramsay
President