



AUSTRALIAN COTTON INDUSTRY COUNCIL

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GM Crop Moratorium Review Secretariat
NSW Department of Primary Industries
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Submission on the New South Wales Review of the Gene Technology (GM Crop Moratorium) Act 2003

The Australian Cotton Industry Council Ltd (ACIC) was established in March 1997 as the peak body representing all sectors within the cotton industry. It provides leadership to the whole industry – farmers, researchers, ginners, shippers, and related equipment and service providers. ACIC is a forum for ideas and resource sharing and is responsible for effecting policy, coordinating industry programs and promoting cooperation between industry bodies. Importantly, the ACIC provides a united approach to handling industry issues for the sustainable long-term future as well as the opportunity to speak with a single voice when dealing with government, service providers, chemical companies and the community.

ACIC welcomes the opportunity to make comment on the review of the Act. Since the introduction of the Act in 2003 many factors have changed and global adoption of GM crops has continued to increase. GM crops have now been grown and traded globally for over a decade and have been managed to meet customer requirements. The Australian cotton industry is a major user of the products of biotechnology and has been able to demonstrate through a number of avenues that it is a capable and responsible user of this technology.

GM cotton has been grown in Australia for over a decade and traded with no problems in marketing lint, cottonseed, cottonseed oil or cottonseed meal. A combination of regulation and a strong industry commitment to stewardship has resulted in the successful adoption and utilisation of GM varieties, delivering positive outcomes for the Australian industry. Of particular importance is the Australian Cotton Growers' Research Association's Transgenic and Insect Management Strategy

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(TIMS) Committee. The TIMS Committee works closely with researchers, industry representatives and trait providers to develop pre-emptive resistance management strategies that the Regulator (APVMA) can incorporate into the registration of a given GM technology (product) thus ensuring industry participation in the robust compliance processes that deliver consistent and measurable trait management at the farm level.

Significant, independent evidence exists that proves that cotton varieties derived through the application of biotechnology have assisted the Australian industry to dramatically reduce the use of traditional pesticides. As a result of the industry access to this technology, farmers are applying up to 85% less pesticides than they were 10 years ago. Given the right to choose, Australian cotton farmers planted 90% of the most recent crop with varieties bred with the use of biotechnology

GM cotton has resulted in positive environmental, economic and social outcomes through the judicious application of science, a controlled approach to commercial trials and a rigorous federal regulatory framework. Australia's Gene Technology Regulatory system is based on sound science. It is transparent and considered to be the most rigorous system in the world.

However the New South Wales Act has created a moratorium on the commercialisation of GM crops in the State that has had a very significant impact on the broader Australian oilseed industry and plant breeders, leading to a disincentive to invest in research and development in this area.

Australian farmers operate under extremely difficult market conditions. Australia's primary industries rely heavily on export markets, which are often distorted by Government subsidies and policy support provided domestically to our international competitors. Australian farmers need to be the most efficient producers in the world while producing products of the very highest quality. Access to the best available technologies and scientific solutions is fundamental to the competitiveness of any modern primary producer. State based moratoria are effectively denying farmers the right to choose the types of production systems they employ to deliver a competitive product to market.



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In summary the Australian cotton industry supports a nationally consistent approach to the regulation of genetically modified crops where the regulations are based upon a foundation of:

- science based decision making,
- controlled but significant commercial trialling,
- a product regulatory process that accounts for the views of industry research in the development of practical use and resistance management directions,
- open and transparent processes for review and consultation with the market and the community, and
- a seed supply market that allows for farmers to make the choice in the application of the technology.

It is the Australian cotton industry's view that the existing Australian Government system for the regulation of GM crops through the Gene Technology Regulator provides for an adequate application of these principles. ACIC supports the removal of the moratorium legislation.

ACIC thanks the New South Wales government for the opportunity to provide input into this review.

Yours faithfully,

Simon McInnes
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Australian Cotton Industry Council Ltd