



Submission on

“New South Wales Review: Gene Technology (GM Crop Moratorium) Act 2003”

GM Crop Moratorium Review Secretariat,
NSW DPI, Locked Bag 21,
Orange, NSW 2800.

This submission has been emailed to:
gmcrops.review@dpi.nsw.gov.au

Cotton Australia Ltd

Cotton Australia supports Australia’s cotton farmers and represents and advances the interests of the industry to governments, non-government organizations, and the public. It focuses its efforts in the areas of industry advocacy, implementation of the industry environmental management program (BMP), industry standards, communications and public affairs and the development of educational and promotional programs. The organisation strives to achieve an environment conducive to efficient and sustainable cotton production

Most Australian cotton farmers contribute voluntarily to Cotton Australia’s funding by way of a bale levy. There are 27 members of Cotton Australia Ltd. including regional grower associations and cotton processing organizations.

The executive staff of Cotton Australia is located in the head office in Sydney while 4 grower service managers are located in regional offices at Toowoomba in Qld, Narrabri in NSW with a policy advisor based in Brisbane.

Cotton Australia Ltd
Suite 4.01
247 Coward St, Mascot
Ph: 02 9669 5222
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Cotton Australia welcomes the opportunity to make comment on the Review of the Gene Technology (GM Crop Moratorium) Act 2003 (referred to here after as the Act). The Australian cotton industry is a major user of the products of biotechnology and has been able to demonstrate through a number of avenues, particularly the Industry Best Management Practices program, that it is a capable and responsible user of this technology. 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 have been able apply up to 85% less chemicals than they would have 10 to 15 years ago with 90% of the most recent Australian crop being planted with varieties bred with the use of biotechnology . In this way, the environment has benefited, the community has benefited and farmers have benefited from the judicious application of science, a precautionary approach to commercial trials and a rigorous federal regulatory framework that has assisted private technology investors to produce a range of biotechnology option for the farmer. Importantly the industry has continued to maintain its heavy investment in tradition plant breeding approaches.

Specific comments in relation to the terms of reference:

1. Assess the expected impacts on marketing, trade and investment for NSW of:
 - extending the Gene Technology (GM Crop Moratorium) Act 2003 (the Act) and maintaining the moratorium orders on the cultivation of GM canola;
 - amending the Act and removing the moratorium orders on the cultivation of GM canola; or
 - Allowing the Act to expire.

Over 60% of the Australia's \$1.4 billion cotton industry is grown in NSW. Although the NSW moratoria does not impact on the cotton industry it is the industry's view that it is time for the New South Wales Government to lift its moratoria on genetically modified crops. It is understood that this would have greatest impact on the development of the canola industry in NSW and to this end Cotton Australia has

reviewed much of the technical information relating to the scientific risk and trade implications of the planting of genetically modified canola. In this vein our industry would support our peak national body the National Farmers Federation in their submission to this review as well as point to the significant shift in policy on this matter from the various grain grower organisations in their move to call for a regulatory framework that allows grains and oilseed producers to choose whether to use varieties derived through the use of genetically modified organisms.

It is well understood that the existing moratoria in some Australian states is significantly impeding the private sector investment in expensive but necessary research associated with genetically modified crops. Australian farmers operate under extremely difficult market conditions. Australia's primary industries rely heavily on export markets, which are often wildly distorted by Government subsidies and policy support provided domestically to our international competitors. The end result is that Australian farmers must be the most efficient producers in the world, while producing products of the very highest quality and in the sphere that is in highest demand by an astute consumer. Access to the best available technologies and scientific solutions is fundamental to the competitiveness of any modern primary producer. State based moratoria are generating an internationally recognised environment that discourages open research and investment in these technologies for all farming sectors and thereby denies farmers the right to choose the types of production systems they employ to deliver a competitive product to market.

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| <p>2. On the basis of the above assessments, make recommendations to Government on the most appropriate option to adopt;</p> |
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A nationally consistent approach to the regulation of genetically modified crops is the only solution to this problem. The regulations should be based upon a foundation of:

- science based decision making,
- controlled but significant commercial trialling
- open and transparent processes for review and consultation with the market and the community

- a seed supply market that allows for farmers to make the choice in the application of the technology

These fundamental principles do not deny the need for a cautious approach to new technology but they do allow for the technology to be investigated and industry investment to be applied. It is the Cotton industry's view that the existing Australian Government system for the regulation of GM crops through the Office of the Gene Technology Regulator provides for an adequate application of these principles.

<p>3. In the event that the panel recommends extension of the legislation, recommend appropriate amendments to the legislation.</p>

- No specific comment is required with regard to this aspect of the review

Cotton Australia thanks the NSW government for the opportunity to provide input into this review and the time and effort invested by the review panel. Representatives of our organisation would welcome the opportunity to supply further information to the review if required.

Regards



Adam Kay
CEO