

GM Crop Moratorium Review Secretariat  
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*Know-how for Horticulture™*

13<sup>th</sup> August, 2007

**Review of the Gene Technology (GM Crop Moratorium) Act 2003: Submission to Independent Review Panel**

Horticulture Australia Limited (HAL) has the following response to the Terms of Reference (TOR) for the Review:

HAL is not in a position to provide an informed opinion on the specific issues raised in the TOR in relation to canola.

However, HAL wishes to provide feedback re the current situation and future potential for GM technology in relation to horticulture crops as follows.

HAL recognises the potential for GM approaches to provide significant value to the industry in the longer term. The preference is for a proactive approach by implementation of a rigorous framework for managing GM crops that also facilitates the development of commercial opportunities. HAL understands that the Office of the Gene Technology Regulator (OGTR) already have a robust regulatory regime in place to manage GMOs. HAL suggests that the focus should be to further develop the regulatory framework to ensure transparent management and longer-term monitoring of human health and environmental concerns. It should also encompass a rigorous labelling and traceability regime.

As you are aware, horticulture consists of a large number of small industries. This significantly impacts the potential to develop commercially viable GM horticulture crops in the short to medium term. There are key issues of consumer acceptance, regulatory costs as well as technological impediments for some crops at present. Hence, it is likely that any initiative in horticulture will only occur after the system is established and there is general consumer acceptance for larger volume crops such as grains. Progress in developing a workable system for these crops will significantly impact future implementation of horticulture GM crops.

HAL supports continuing dialogue with all stakeholders (industry, government, regulators and consumers) to ensure the Australian industry is able to deliver safe, sustainable, quality products for domestic and overseas markets.

Thank you for the opportunity to provide feedback on this important initiative and we would appreciate being advised of significant developments post the Review.

Yours sincerely,

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