

30 September 2019



GM Secretariat Support
Primary Industries and Regions SA – PIRSA
Government of South Australia
GPO Box 1671
ADELAIDE SA 5001

Via email: PIRSA.GMReview@sa.gov.au

To whom it may concern,

Re. Statutory consultation on regulations to amend the genetically modified (GM) food crops moratorium in South Australia

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission on the Genetically Modified Crops Management (Designation of Area) Variation Regulations 2019, which provide for the moratorium on growing GM food crops to be lifted from all parts of mainland South Australia, and restricted to Kangaroo Island.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

The August 2019 announcement that the South Australian Government would move to restrict the moratorium on the cultivation of GM crops in South Australia to Kangaroo Island was welcomed by the NFF. This brings South Australia into step with other mainland states where farmers are able to access and benefit from GM crops that have been approved as safe by the Office of the Gene Technology Regulator. This decision is underpinned by expert advice and the outcomes of extensive consultation undertaken during the *Independent Review of the South Australian GM Food Crop Moratorium* led by Emeritus Professor Kym Anderson. The Independent Review recognised the cost of the moratorium South Australia's grain industry. This cost is conservatively estimated at \$33 million since 2004 for canola alone.

The NFF strongly supports the right of farmers to adopt the method of production best suited to their business needs, be that utilising GM, conventional, organic or any combination of these methods of production. We therefore support the proposed regulations, which will facilitate grower choice in mainland South Australia, promote investment in research and development and enable free movement of approved GM material through South Australia. The NFF's position on this issue was outlined in detail in our 2018 submission to the

Independent Review of the South Australian GM Food Crop Moratorium, and we refer the GM Secretariat to that submission for further information.

The proposed regulations will maintain the moratorium on the cultivation of GM crops on Kangaroo Island, in recognition that a group of producers on Kangaroo Island has established a market for non-GM canola in Japan. This is in line with the policy proposal developed by Grain Producers South Australia (GPSA) to accommodate the geographically and economically unique circumstances of Kangaroo Island growers. Grain Producers South Australia is a member of the NFF, via Primary Producers South Australia, and the NFF supports the submission put forward GPSA.

Thank you again for the opportunity to comment on the proposed regulations. Should you require any further information in relation to this submission please contact Adrienne Ryan, General Manager Rural Affairs, on 02 6269 2666 or aryan@nff.org.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Tony Mahar', with a large, stylized flourish at the end.

TONY MAHAR
Chief Executive Officer