

NASAA Submission to the Productivity Commission Draft Report on the Regulation of Australian Agriculture

The National Association of Sustainable Agriculture Australia (NASAA) has been informed of proposals in the Productivity Commission draft report on Regulation of Australian Agriculture that if implemented, will seriously affect the livelihood of all producers of product labelled as organic, biodynamic, biological, ecological, sustainable (or words of similar intent used to imply organic production¹).

NASAA has over thirty years of history supporting and developing Australian Organic and Sustainable Agriculture and it is from this foundation that we respond to the current (July 2016) draft report.

Australia is an active member of Codex Alimentarius, and we specifically reference the Codex document **GL 32–1999 GUIDELINES FOR THE PRODUCTION, PROCESSING, LABELLING AND MARKETING OF ORGANICALLY PRODUCED FOODS**, which was developed with leading input from Australia who chaired the working group responsible for drafting the document. Clause 1.5 of the guideline states: *“All materials and/or the products produced from genetically engineered/modified organisms (GEO/GMO) are not compatible with the principles of organic production (either the growing, manufacturing, or processing) and therefore are not accepted under these guidelines”*

We refer to statements in the Commission’s draft report page 234/235 which read:

“[It may not be possible to completely eliminate the potential for cross-contamination.] However, evidence suggests that it is possible to manage segregation throughout the supply chain such that GM and non-GM systems can co-exist.” and *“In addition, the ability for GM and non-GM crops to co-exist in the marketplace is evidenced by the growth of the organic food sector in countries where GM crops are grown.”*

and raise that these conclusions are erroneous on a number of accounts. Cross contamination is a very real issue for organic farmers with any such occurrence impacting their livelihood through loss of certification. As stated in your own report, **it is not possible to completely eliminate the possibility for cross-contamination**, which can be confirmed by evidence of such events occurring in those countries where GM crops are grown. The report also fails to note that the organic industry in such countries have had to amend their National Organic Regulations to accommodate a GM tolerance limit - clearly contra to the Codex Guideline requirements and an issue highlighted during equivalency agreement/trade discussions with those countries.

Page 235 of the Report puts forward the argument that *“Several reviews and regulatory impact statements (RISs) to evaluate the costs and benefits of the moratoria have consistently failed to demonstrate net benefits.”* Again this statement is limited in effect, since RISs in Australia regarding this issue have only focused on current GM crops (canola and cotton). As more GM crops enter commercial production in Australia ie from the field trials currently underway for banana, barley, perennial ryegrass, safflower, sugarcane, wheat and white clover, cost benefit of any such moratoria will only increase.

The Australian Organic industry represents over 20 Million hectares of land, with a farm gate production of 100’s of Millions of dollars. Organic produce from producers operating within the States that have imposed GM moratoria have a strong trade advantage over organic produce arising from GM growing countries and/or States.

Therefore NASAA oppose **Draft Recommendation 6.1** which requires that State and Territory Governments remove their moratoria on genetically modified (GMO) crops and repeal the relevant legislation.

¹ Codex Alimentarius **GL 32–1999 GUIDELINES FOR THE PRODUCTION, PROCESSING, LABELLING AND MARKETING OF ORGANICALLY PRODUCED FOODS**