

To whom it may concern,

I am making a submission in response to the draft report on Regulation in Agriculture, as follows:

Draft Finding 6.1

*The successful coexistence of GM and non-GM crops is possible and has been demonstrated both in Australia and overseas. This means that if there are any market access or trade benefits (including price premiums for non-GM products), they would be achieved regardless of whether GM crops are in the market.*

It has *not* been shown conclusively that GM and non-GM groups can coexist. In fact the opposite has been shown to be the case. Genetic contamination of crops or neighbouring land is common, and contamination from GM crops have been documented.

Here I am particularly referring to the case of Marsh v Baxter in Western Australia, where Mr Marsh temporarily lost his Organic Certification due to contamination by Mr Baxter's GM canola. [http://www.supremecourt.wa.gov.au/files/Judgment%20Summary%20-%20Marsh%20v%20Baxter%20\(CIV%201561%20of%202012\)%2028%20May%202014.pdf](http://www.supremecourt.wa.gov.au/files/Judgment%20Summary%20-%20Marsh%20v%20Baxter%20(CIV%201561%20of%202012)%2028%20May%202014.pdf)

There are also many instances globally of contamination occurring and non-GM farmers suffering huge financial losses.

[www.gmcontaminationregister.org/](http://www.gmcontaminationregister.org/)

When such contamination has occurred there is no recourse for the owner of the contaminated crop. Worse they are often subjected to further costs to pay royalties for proprietary seed which they did not buy.

Consumers are well aware of this issue and as a result non-GM crops grown in regions or even nations with GM crops can not secure a premium price.

As the use of GMO increases it is becoming increasingly apparent that there are not any significant productivity gains from using GMO. I refer to the report titled [Failure to Yield](#) published by the Union of Concerned Scientists. Given that lack of significant productivity gains and significant economic risks there is every reason to ban the use of GMO in Australia. Therefore recommendation 6.1 should be withdrawn.

DRAFT RECOMMENDATION 9.1

*Food Standards Australia New Zealand should remove the requirement in the Food Standards Code to label genetically modified foods.*

Consumers *should* have the right to know exactly what's in their food. Many consumers want the option to choose non-GMO foods. In order for them to do so it is essential that that food containing GMO derived food products be labelled as such.

#### DRAFT RECOMMENDATION 9.2

Food Standards Australia New Zealand should review the standard for the level of gluten allowed in foods labelled as 'gluten-free', taking into account scientific evidence, international standards and risks to human health, and set a maximum allowable parts per million level for foods to be labelled 'gluten-free'.

A common standard would be desirable, however the level below which food would be considered "gluten free" should be set independently by Australian Medical Association and relevant organisations such as Coeliac Australia.

#### INFORMATION REQUEST 9.2

The Commission is seeking information on the costs and benefits of egg stamping relative to alternative traceability systems for eggs (such as labelling on egg cartons and requiring food businesses to keep records). Are there examples where the source of an outbreak of salmonellosis caused by eggs could not have been traced in the absence of egg stamping?

Egg cartons in Australia are required to be labelled in accordance with regulation, and all details of the farm/business where the eggs were produced are already on the carton - much easier to find in a rubbish bin than a crushed up egg shell! In a home circumstance, stamping an egg does not make it more traceable.

In a commercial situation, food businesses should have accurate records of where products were purchased from and when they came in, therefore making stamping unnecessary here also.

This is a burdensome regulation on farmers in general and family farmers in particular.

#### DRAFT RECOMMENDATION 12.1

*The Australian Government should increase the screening thresholds for examination of foreign investments in agricultural land and agribusinesses by the Foreign Investment Review Board to \$252 million (indexed annually and not cumulative).*

The Australian government should most definitely *not* do this. We need foreign investment in Australia, and to attract foreign investment we need the Australian public to be widely in support. Such a move is likely to increase the Australian public's aversion to and fear of foreign investment. If anything the Australian Government should lower the threshold and make the foreign investment more transparent for the benefit of Australia and foreign investors.

Thank you.