



27 September 2019

The Hon Tim Whetstone MP
Minister for Primary Industries and Regional Development
GPO BOX 1671
ADELAIDE SA 5001

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

Dear Minister

RE: GENETICALLY MODIFIED FOOD CROPS MORATORIUM IN SOUTH AUSTRALIA

The Australian Seed Federation (ASF) is the peak national body representing the interests of Australia's sowing seed industry at the state, national and international levels. The ASF membership base comprises companies from all sectors of the seed supply chain including plant breeders, seed growers, seed processors and seed marketers.

The ASF welcomed the recent announcement to lift the GM moratorium on mainland South Australia. The ASF supports choice in relation to crop biotechnology provided that the choice is based on sound science and respects the rights of others to also choose.

For over a decade, South Australian farmers have been denied the ability to choose from the full suite of tools that have been available to their competitors in neighbouring states. As demonstrated by the recent Independent Anderson Review, they have been farming with one hand tied behind their back.

Multiple independent reports have demonstrated there is no trade and marketing benefit to maintaining the GM moratorium in South Australia. The Anderson review found that the GM moratorium has cost the state's canola industry \$33 million since 2004, with no tangible trade or marketing benefit in return.

The South Australian GM moratorium restricts growth and innovation in the State's agricultural sector. It denies South Australian farmers access to innovative breeding technologies and new crops both now and in the future and bans the transport of GM seed across the state.

The GM seed transport ban has significant negative implications for the Australian seed industry. It has resulted in increased cost to seed producers and long delays resulting from having to use other transportation measures to divert genetically modified seed around South Australia.

The transport ban imposes a logistical constraint on the operations of plant breeders who are involved in this market sector, including significant additional costs being imposed on ASF members who are actively working to supply the seed for sowing market nationally. The transport ban applies even to those GM products that have been approved for commercial release in Australia by the OGTR.

This ban is affecting the industry's ability to source seed from production areas and to transport it within a timely and cost-effective manner to customers around Australia. GM seed approved for planting in Australia cannot be transported directly by truck across the country with the SA GM transport ban in place. It must either be sent by road around to Western Australia via the Northern Territory, shipped via sea around South Australia, or air freighted. This adds time and increased costs which not only affects ASF members in WA and the Eastern states but the entire seed supply chain particularly in South Australia, as it is likely the increased costs are being passed on to all Australian customers, including growers.

Quality testing of seed has also been negatively affected, with GM seed requiring exemption permits for transport to seed testing laboratories in South Australia. This is affecting ASF members' bottom line and puts us at a disadvantage trade-wise in reacting to market demand.

Maintaining the GM moratorium would result in continued restriction on the growth of the seed industry in South Australia and less opportunity for South Australian growers to access current and new plant breeding technology advancements which other States are adopting and using in the marketplace. The demand for GM seed is continuing to increase both nationally and globally; however, SA growers remain at a disadvantage.

Considering this, the ASF supports the announcement to lift the GM moratorium on mainland South Australia as this will allow seed companies and farmers to have a choice in cultivating GM or non-GM varieties. The seed industry is confident that market choice can be delivered, as has been demonstrated in other States where both GM and non-GM crops are being grown.

To remain internationally competitive and meet the potential for future growth will depend on the South Australian Government's continued adoption of policies that embrace innovation, engage investment and bring new technologies to market in a timely manner.

Should you have any questions or require any further information in regards to this submission, please do not hesitate to contact the ASF Secretariat directly (omewett@asf.asn.au; 02 6282 6822).

Yours sincerely

Osman Mewett
General Manager