



12th May 2023

Ms Sonya Broughton
A/Executive Director, Biosecurity

C/o Dr Modeka Perera
Department of Primary Industries and Regional Development

Via e-mail: gmcfaareview@dpird.wa.gov.au

Second Review of the Impact of the Repeal of the *GM Crops Free Areas Act 2003*

Dear Ms Broughton

Thank you for your letter of 23 March.

With respect to those genetically modified crops commercially grown in WA between 19 June 2018 and 31 June 2022, these can only be those that have been licensed by the Commonwealth's Office of the Gene Technology Regulator.

In Western Australia's broadacre cropping system GM canola is most commonly found.

With respect to the effectiveness of the segregation systems in place, the grains industry is very familiar with segregation systems, as they form the basis of meeting market demand, so the purchaser receives the product they requested.

The state's largest bulk handling company, CBH, stated in its submission to the 2018 WA Parliamentary Inquiry into mechanisms for compensation for economic loss to farmers in Western Australia caused by contamination by genetically modified material that "Since the adoption of GM canola in WA, no shipments of grain have been rejected by our trading partners due to the unintended presence of GM material".

The Licence and Stewardship Agreement that growers enter into in order to grow GM canola requires them to maintain a 5m buffer between GM canola crops and any non-GM canola crops. This buffer allows WA farmers to meet the EU adventitious presence level of 0.9%, which has been the basis for the adoption of the 0.9% presence level in the Australian non-GM receival standards.

The grains industry has proven it can successfully handle the segregation of grains required to satisfy and maintain open markets.

With respect to any issues or problems identified as resulting from the repeal, the PGA is unaware of any.

However, the PGA wishes to provide further feedback as requested.

The PGA draws your attention to the 2015 Decision Regulatory Impact Statement prepared by the then Department of Agriculture and Food Western Australia regarding the *Genetically Modified Crops Free Areas Act 2003*.

This statement recommended that the Act be repealed. It also recommended that the impact of the repeal be reviewed 12 months after repeal and (at a minimum) every 2 years thereafter for a period of 7 years.

This is not a legislated requirement, merely a Departmental policy.

The PGA points out that should the repeal of the *GM Crops Free Areas Act 2003* be reviewed for another 7 years, the cultivation of GM crops in this state will have been subjected to scrutiny for 15 years. This is extraordinary.

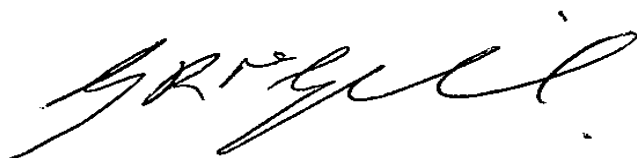
There is no need for any legislative repeal to be subject to this level of analysis for such a lengthy period. It is self-evident that in its absence, any detrimental impacts from the repeal would have become apparent in a short time.

Consequently, the PGA asks that any report to the Minister include a recommendation to terminate any further reviews into the future.

There are much better uses for the Department's (and the PGA's) limited resources than interminable reviews.

In conclusion the PGA considers that this Act was never required for any valid technical or scientific reasons. It was a political reaction to satisfy activists with anti-science agendas.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'Gary McGill', with a stylized, cursive script.

Gary McGill

Chairman
PGA Western Grain Growers Committee