



Our reference: A3131148

The Legislative and Governance Forum on Gene Technology (LGFGT)
Gene Technology Secretariat
Department of Health
MDP 1060
GPO Box 9848
CANBERRA ACT 2601

Dear Gene Technology Secretariat

**WESTERN AUSTRALIAN GOVERNMENT SUBMISSION TO THE THIRD NATIONAL
REVIEW OF THE GENE TECHNOLOGY REGULATORY SCHEME**

Thank you for the opportunity to provide further comment and feedback on the preliminary report of the above review.

This submission is based on advice from the members of the Western Australian (WA) Gene Technology Interdepartmental Committee (GTIDC) and the Department of Primary Industries and Regional Development's Institutional Biosafety Committee. These committees include representatives from other WA Government agencies (Department of Health and Department of Biodiversity, Conservation and Attractions) and the community. Overall, Western Australia is supportive of all 33 findings, with a few comments:

1. Overarching Issues Findings 1& 2 -

- Supported

2. Technical Issues Findings 3 to 7-

- Supported in principle.
- Further clarity is sought for finding 3: In terms of seeking international consistency of definitions, this may be complicated by the differences in national regulatory schemes (eg. product or process trigger).

3. Regulatory Issues Findings 8 to 15 -

- Supported findings 8 to 15 in principle
- Finding 9 – the members support the Office of the Gene Technology Regulator (OGTR) to undertaking complete risk assessment for each licence application in the first instance, and then the use of risk tiering for added traits.
- Finding 11 - clarity is required on removing the requirement for a dealing to be authorised before being included on the GMO register. It is our understanding that all GMOs dealings need to be authorised.

Sustainability and Biosecurity

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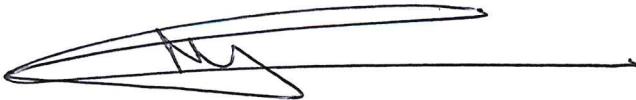
4. Governance Issues Findings 16 to 28 -

- Supported.

5. Social & Ethical Issues Findings 29 to 33 -

- Supported findings 29-33 in principle.
- Finding 33 - the members suggest that the Regulator may like to consider publishing high impact refereed publications related to risks of GMOs on human health and safety and the environment on their website.

Yours sincerely

A handwritten signature in black ink, appearing to be 'MIA CARBON', written over a horizontal line.

**MIA CARBON
EXECUTIVE DIRECTOR
BIOSECURITY**

23 May 2018