

Submission Cover Sheet

# Review of the Moratorium on GM Canola

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**Name of Individual/Organisation: Moreland Community Health Service**

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**Attachments Submitted with this Submission:**

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GM Canola Review Panel Secretariat  
Department of Primary Industries  
Level 19, 1 Spring Street  
GPO Box 4440  
Melbourne, VIC, 3001

To the GM Canola Review Panel Secretariat,

**RE: REVIEW OF THE MORATORIUM ON GENETICALLY MODIFIED CANOLA**

With this letter, I put forward my request that the moratorium on genetically modified (GM) canola be extended until at least 2013.

As a nutritionist implementing a food security project in suburban Melbourne, I have substantial reservations about Victoria's readiness to accept commercial growing of GM canola.

In 2004, the Victorian government decided that a moratorium on commercial release of GM canola was appropriate due to 'divisions and uncertainty within industry, the farming sector and regional communities about the impact of GM canola on markets.' This uncertainty and division has not been resolved in the past 3 years.

There is still division amongst farmers. The Victorian Farmers Federation supports the commercial growth of GM canola but there are groups of farmers who are not supportive (such as the Network of Concerned Farmers). Central to this division is the lack of detail and surety that GM and non-GM crops can co-exist in a financially viable way. There is evidence that co-existence is possible but this will involve changes to farming practices and increased monitoring<sup>1</sup>. One study estimated an increase in cost of growing non-GM canola of 41% (presuming that the costs of monitoring etc were the responsibility of the non-GM farmer).<sup>2</sup>

Consumers, industry and primary producers **must** have a choice between GM and non-GM crops, ingredients, feeds and food. As such, successful separation of GM and non-GM crops must be guaranteed. It is not yet clear how this is to occur, who is to be responsible for ensuring adventitious presence of GM characteristics occurs below threshold levels and how each partner in the chain would be compensated should contamination occur. We require clear guidelines that address these issues from the farm, through transport, to processing plants, food manufacturers and finally to the plate. Without these, the 'divisions and uncertainty' that were the driving force for the initial moratorium cannot be resolved and the moratorium should therefore stand.

There is still a great deal of consumer resistance to GM foods and ingredients. A report published by Biotechnology Australia in July (2007) showed that consumers were 36-45% percent less willing

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<sup>1</sup> Brookes, G. 2004, 'Co-existence of GM and non-GM crops – Current experience and key principles, PG Economics Ltd, United Kingdom.

<sup>2</sup> Bock, A., Lheureux, K., Libeau-Dulos et al. 2002, *Scenarios for coexistence of genetically modified, conventional and organic crops in European agriculture*, European commission Joint Research Centre & Institute for Prospective Technology Studies.



to consume GM foods compared to organic foods<sup>3</sup>. Sixty-two percent of surveyed consumers did not find the use of bacterial genes acceptable with a further 44% believing that plant characteristics should only be altered through traditional breeding practices. It would be fair to say then, that the GM canola varieties that are the subject of the current review would not be acceptable for the majority of Australian consumers.

This has potential to alter the market for GM canola in future. At present, food labelling laws are not sufficient to provide Australian consumers adequate information to make a choice regarding their consumption of GM ingredients. In particular, if a highly refined ingredient such as oil or sugar was sourced from a GM plant or if a food is produced from an animal fed GM feed, there is currently no obligation to label the food as GM.<sup>4</sup> There is already action within the community to amend this and it would be expected that lobbying to improve food labelling would gain further backing should GM canola be approved for commercial growth. With adequate labelling, the vast majority of consumers who wish to avoid GM ingredients will vote with their wallets and there is great potential for market share losses for companies using GM ingredients. If the use of GM canola products were resulting in losses to the food manufacturers, this would most certainly filter down to the farmers producing the canola, limiting the domestic market for GM canola.

Food labelling laws across the world have been slow to adapt to the increasing technology in our food production. The acceptance of GM canola imports in many parts of the world<sup>5</sup> should not be confused with consumer acceptance of GM foods, ingredients or feed. Across the world, many groups are lobbying for more stringent food labelling laws. Only when consumers are provided with adequate information regarding the ingredients of their food will true acceptance of GM crops be known. GM canola should not be approved for commercial growth based on the assumption that consumers accept GM foods. Nor should the approval be based upon continued consumer ignorance. Both of these issues will be brought to the fore with improved food labelling. Consumers are the major driving force in the market. If consumers reject GM canola and its derivatives, there will be no market. At this stage, we do not know how this will alter the international market for GM canola. Further research and community consultation and education is required.

Alternatives should also be explored. There are already conventionally bred herbicide tolerant canola varieties available. These varieties make up only 30-40% of Victoria's canola crop. Therefore, there is scope to extend this further. The wider use of conventionally bred herbicide resistant varieties should be trialled more extensively before the approval of GM canola.

There is far too much uncertainty about the benefits and costs of the commercial production of GM canola in Victoria. The moratorium was initiated because of 'uncertainty and division' and in view of the lack of resolution of these issues, the moratorium should be extended to allow further research, consultation and observation to occur.

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<sup>3</sup> Eureka Strategic Research, 2007, *Community attitudes to biotechnology – Report on food and agriculture applications*, Biotechnology Australia.

<sup>4</sup> FSANZ, 2007, *Australia New Zealand Food Standards Code (incorporating amendments up to and including amendment 92)*, Commonwealth of Australia, Canberra.

<sup>5</sup> ACIL Tasman, 2003, *Genetically modified canola – market issues, industry preparedness and capacity for segregation in Victoria*, ACIL Tasman.

<sup>6</sup> Foster, M., & French, S. 2007, *Market acceptance of GM canola*, Commonwealth of Australia, Canberra.



**Moreland Community Health Service**

I thank you for the opportunity to share my thoughts on the review and look forward to your response.

Yours sincerely,

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