

Submission Cover Sheet

Review of the Moratorium on GM Canola

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**Name of Individual/Organisation: Conservation Council of Western Australia
Inc.**

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Attachments Submitted with this Submission:

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CONSERVATION COUNCIL

OF WESTERN AUSTRALIA INC.

16th August 2007

Dr Robert Sward
GM Canola review Panel Secretariat
Department of Primary Industries
Level 19, 1 Spring Street
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Melbourne VIC 3001

Dear Dr Sward

Review of the moratorium on commercial cultivation of GM canola in Victoria

Thank you for the opportunity to make this submission. The Conservation Council of WA (Inc) would also like to raise the following specified under the review panel's terms of reference:

1. Assess the economic impacts on Victoria of the moratorium on commercial genetically manipulated (GM) canola

The moratorium has had positive impacts, from the continued GM-free status of Victoria's (and overall Australian) food supply, including:

- premiums here and from markets of Europe, Japan and China for GM free canola and other primary GM free produce;
- keeping our competitive advantage in global canola markets as Australia is the only GM-free trader of canola;
- an example of the premium prices we are receiving is shown by the prices in 2007, where Australian canola has fetched \$50 - \$100 more than Canadian canola.

2. Assess the expected economic impacts of allowing the GM canola moratorium to expire

There is clear indication that in Western Australia GM-free canola is highly valued in the international marketplace. The loss of market share in the international marketplace will affect all states, not just Victoria.

There are also additional economic impacts that must be considered. These are:

- costs of managing herbicide tolerant weeds (wild radish, turnip, charlock, ryegrass and barnyard grass) that will result from

- outcrossing from Roundup and Basta tolerant GM canola. The cost will be borne by the community at large, including all land managers - local councils, parks authorities, landcare groups, etc.
- additional costs of managing herbicide tolerant volunteer canola in crop rotations;
- shoppers here and abroad will continue to flock to organic and GM-free conventional foods;
- growth in the organic food sector is stronger than that of other food sectors.

Australia was able to capture the EU canola market from Canada in 1999 because it remained GM free. Thus the introduction of GM crops would hinder rather than foster trade. For example, there are no markets around the world that will allow products to be called organic if they have a level of contamination from GM products. Contamination is inevitable if the moratoriums are lifted. So, overnight the export market in organic goods would be wiped out.

3. Recommend whether Government should allow the moratorium on commercial GM canola to expire or be extended

- the moratorium should be extended until 2013 at least because no other GM crops are in the development pipeline that could possibly be commercialised in the next five years;
- once GM is introduced there will be no turning back, it will be impossible to stop GM free produce being contaminated.

4. Recommend any complementary policies and practices required to address the consequences of the moratorium on commercial GM canola ending

There are numerous concerns from farming communities as well as from consumers regarding the end of the moratorium. Segregation and liability, environmental (including cross contamination) and human health concerns must be investigated thoroughly. These also include:

- who bears the costs of segregation for farmers wanting to remain non-GM;
- strict liability regime for any GM contamination of conventional or organic cropping systems;
- management of contamination including removal of cross contamination of non-GM canola and outcrossing with other *brassica* species on non GM farming land as well as on public land;
- requirement that all products of GM canola, including animal feed and oil, to be fully labelled and identified as a product of gene manipulation technology;
- specification of the level of GM contamination in conventional crops that would trigger end point royalties;

The Conservation Council of WA Inc is also concerned that the industry is extremely monopolised, in particular by Bayer, the largest agri-chemical company and by Monsanto, the largest seed company in the world. A

monopoly ownership of the global food and seed supply is not in the public interest as it also means monopoly profits for those companies.

Overseas cases have shown that GM crops cannot be contained and contamination is inevitable and irreversible. Farmers have also reported an increase use of pesticides and herbicides despite adopting the technology that is meant to address those key issues.

There is also increasing evidence of adverse health effects from the consumption of GM food. CSIRO Australia ended a ten year study after their GM pea caused severe allergic reactions in mice, including lung damage.

In summary, the Conservation Council of WA Inc is strongly opposed to the commercial growing of GM canola and supports a 5-year extension to the GM moratorium in Victoria.

Thank you for this opportunity to comment.

Yours faithfully



Chris Tallentire
DIRECTOR