To Whom It May Concern

Please find a submission on the proposed amendments to the regulations under the Genetically Modified Crops Management Act 2004 to lift the moratorium on growing GM Food Crops in all parts of mainland South Australia.

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Primary Industries and Regions SA - PIRSA
Government of South Australia
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Via e-mail: PIRSA.GMReview@sa.gov.au

Statutory consultation - proposed amendment to the Genetically Modified Crops Management Act 2004 (SA) regulations

Dear Sir/Madam

The Pastoralists and Graziers Association of WA (Inc) (PGA) is a non-profit industry organisation established in 1907, which represents primary producers in both the pastoral and agricultural regions of Western Australia.

As a state farm organization based in Western Australia, the PGA would not typically hold an opinion on regulatory arrangements in another State.

However, the PGA has consistently supported the complete deregulation of Genetically Modified (GM) crops in Western Australia.

In the context of the broad acre farming that is typical of the Western Australian grain belt, RR canola is the primary GM crop that is cultivated.

GM canola has been engineered to reduce the agronomic inputs (fuel, chemicals, fertilizer) required to grow it.

Western Australian grain growers plant canola in general as part of their crop rotation plans.

Canola in the rotation allows farmers to better manage their weeds. Because canola is a broadleaf crop, and because there are different herbicide tolerant varieties of canola, farmers have more options for weed control than in cereal crops such as wheat and barley.

Further, cereal yields after canola is cultivated are often enhanced because of the disease cleaning that occurs when an unrelated crop type such as canola is alternated with cereals and kept free of grassy weeds.
Canola is a profitable crop in its own right and is an excellent fit with the cereals or pulses that the vast majority of Western Australian grain belt farmers grow.

Canola is grown for its seed which is crushed, and the oil used in margarine, cooking oils, salad oils and edible oil blends, and as a bio-fuel.

Oil from GM canola does not contain any GM material from the plant, as the genetic material/DNA is removed in the refining process.

Separate grain logistic supply chains for GM and non-GM canola have been successfully operated in Western Australia since 2009, and is now a mature activity that is routinely carried out without any significant events.

In fact, the state's leading grain logistics company, CBH, has no difficulties segregating GM and non-GM canola at its receival points, silos, train sets, grain centres and port terminals.

CBH stated this in its submission to the Parliament of Western Australia's Legislative Council Standing Committee on Environment and Public Affairs "Inquiry into mechanisms for compensation for economic loss to farmers in Western Australia caused by contamination by genetically modified material".

This shows that the separation of GM and non-GM crops can be achieved in working systems, and the risk of admixture can be successfully controlled, if not eliminated.

A research paper (The economic and environmental cost of delayed GM crop adoption: The case of Australia's GM canola moratorium) published in the journal "GM Crops & Food" by Biden et al of the Department of Agricultural and Resource Economics, University of Saskatchewan, Saskatoon, Canada, was also submitted to the Parliament of Western Australia's Legislative Council inquiry.

This submission showed that using RR canola resulted in less machinery passes with a corresponding reduction in fuel use and emissions, the lowest use of herbicides, and the lowest variable input costs.

Further, many Western Australian grain belt farmers report that oil content from GM canola is higher, as seasonal influences such as weed competition (and therefore competition for available moisture and nutrients) can be better controlled.

The experience of Western Australian farmers when growing GM crops is that there are no detectable disadvantages, only positives.

Yours Faithfully

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