Slow Food® Hobart

PRODUCTIVITY COMMISSION DRAFT REPORT
"REGULATION OF AUSTRALIAN AGRICULTURE"

RESPONSE SUBMISSION FROM SLOW FOOD HOBART
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DRAFT RECOMMENDATION 6.1 : "*The NSW, SA, WA, Tasmanian and ACT governments should remove their moratorium on genetically modified crops. All state and territory governments should also repeal the legislation that imposes or gives them powers to impose moratoria on the cultivation of genetically modified organisms by 2018".*

Slow Food Hobart (SFH) has previously submitted responses to (1) the Tasmanian Government's GMO Moratorium Review in 2013; and (2) the Federal Government's call for public submissions to (a) the Agricultural Competitiveness Issues Paper, and (b) the subsequent Green Paper.

Slow Food Hobart totally opposes the Productivity Commission's Regulation of Australian Agriculture Draft Recommendation 6.1 as it applies to Tasmania specifically, and Australia in general. This response document details the reasoning behind that point of view.

Slow Food

Slow Food Hobart, established in 1998, draws its Membership from across Tasmania. Members include, among others, producers, farmers, chefs, talented home cooks, educators, writers, scientists, health professionals, retirees and students. It is one of the 1,500 Convivia (local groups) in Slow Food International (SFI) which was formally founded in Paris in 1989.

SFI has since evolved into a global movement with 100,000 members in 150 countries. They, along with millions of supporters, are involved in thousands of projects, all of which embrace a comprehensive approach to food which recognises the strong connections between plate, planet, people, politics and culture.

This approach is based on a concept of food defined by three interconnected principles :

GOOD – quality, flavoursome and healthy food
CLEAN – food production and consumption that does not harm the environment, animal welfare or our health
FAIR – accessible prices for consumers and fair conditions and pay for small scale producers

SFH is committed to protecting traditional and sustainable quality foods, primary ingredients, conserving methods of cultivation and processing, and defending the biodiversity of cultivated and wild varieties.

GMO Moratorium in Tasmania

In August 2013 the Tasmanian government sought public submissions as part of an extensive review of the State's GMO Moratorium. On 09 January 2014 The Tasmanian Minister for Primary Industry announced the Government's decision to maintain a moratorium on the commercial release of GMO's to the Tasmanian environment. The government stated it would work with relevant industries, key stakeholders, and the Tasmanian Institute of Agriculture (TIA) to monitor developments in gene technology as well as market, marketing and branding implications for Tasmanian food producers and processors. This would be done via an Annual Report to the Minister.

The State government, through AgriGrowth Tasmania, undertook a "GMO Annual Environmental Scan" over the 12 months up to December 2015. The process included consultations with industry groups representing dairy, fruit, poppy, salmonid and wine producers, as well as beekeepers and organic-biodynamic enterprises. This industry consultation did not reveal any new issues or technologies that would trigger a review of the existing moratorium.

AgriGrowth Tasmania also took note of the following :

Of Tasmania's ten major trading partners, apart from the USA and Singapore, consumers in the others remain sensitive to GM foods.

No GM crops are grown in New Zealand due to on-going consumer resistance to GM foods.

In December 2014 the Organic Industry Standards & Certification Council rejected an application from the WA Department of Agriculture & Food to increase the allowable threshold of GM material in certified organic food. China indicated that if Australia watered down these GMO tolerance laws it could have impacts on the importation of Australian organic products. If these tolerance laws are ever lowered the economic outlook for successful companies such as Bellamy's Organic will be dire.

The Australian Lucerne Seed Industry has put a self-imposed moratorium on GM-Lucerne being grown in Australia, due to the potential impact of GM-contamination of its seed crops. Why? Because their biggest export market is Saudi Arabia, which does not accept GM seed.

On Kangaroo Island, SA, 70 farmers currently cultivate 40,000 hectares for GM-free grain and legume crops. They produce 60 tonnes of product for an extremely specialized premium (high value) market. This should not be compromised by GM contamination on the island.

Countries are still looking for points of difference when marketing their primary products. Since August 2015 Scotland has been looking to prohibit GM-crops as the government is worried their presence in the environment could damage the country's "clean green" brand. This change would have been implemented under new EU rules that allow member countries to opt out of EU-approved GM-crops. (The recent UK Brexit vote now puts this strategy in jeopardy).

AgriGrowth Tasmania concluded ***"there is no need to trigger a review of the moratorium on the commercial release of GMO's into Tasmania's environment at this time"***. The moratorium on GM crops and GM animals grown commercially in Tasmania will continue until November 16th 2019.

(see www.dpipwe.tas.gov.au/agriculture/Tasmanian-gene-technology)

Slow Food Hobart wholeheartedly supports the on-going GMO Moratorium in Tasmania. SFH is supportive of reinvigorating paddock to plate systems, thus ensuring food product traceability, and maximising Tasmania's point of difference in an increasingly competitive food commodity market. The Tasmanian Government's consistency, innovation and steadfast resolve to continue to stand up for very small and small Tasmanian businesses, and start-up or pop-up initiatives, is to be applauded. These vibrant enterprises are to be encouraged so that they can continue to maximize their sizeable contribution to the economic prosperity of Tasmania.

Tasmania's GMO Moratorium, with particular reference to its impact on Very Small, and Small and Medium Enterprises (SME's) in the State's Primary Production Sector

Tasmania's size, location and environment, and in particular its GMO moratorium, have made the State an increasingly desirable place to set up SME's in the primary production sector. SME's are the least likely to utilize GM-crops, and thus the best placed to secure customers in GM-free markets. Tasmania's GMO-free status is an added bonus in the marketing of their high end / premium / niche / high value-added products. SME's might produce smaller volumes but they are invariably of high value – the complete opposite of low value, low profit margin, commodity food products.

The availability of GM-products is usually used to drive down further the prices paid to primary producers. GM-free status should be used, wherever possible, to obtain premium prices for food products. Tasmanian primary producers already operate under the significant economic disadvantages of high export freight costs and limited export freight capacity. Only by having pursued premium GM-free markets have they become profitable enough to significantly reinvest in their enterprises.

SME's tend to be highly creative, innovative and entrepreneurial – all traits valued by the State as it endeavours to grow its rural economy. It is well documented that SME's are the biggest job creators in developed economies. They should continue to be encouraged to set up in Tasmania where job creation is an on-going priority for the State government. Jobs continue to be lost from other sectors that have historically been located in the regional areas of the State. These areas tend to be the preferred locations for establishing primary production SME's since they preferentially have the best soil and local climatic conditions for small and medium agricultural enterprises.

SFH is an advocate for (re)connecting consumers with smaller local food producers and processors. SFH considers the availability of as diverse a range of markets and retail outlets as possible to be of fundamental importance to the on-going economic success of primary production SME's in Tasmania. The GMO moratorium allows these SME's unencumbered access to *all* markets

The interests of all primary producers have to be taken into account when discussing the GMO moratorium. Due to Tasmania's limited land mass, agricultural SME's assume a greater relative importance, and should be given a greater voice. SME's include the highest proportion of successful Organic and Biodynamic producers. These businesses have generated significant increased economic activity under the GMO moratorium, and would be the most disadvantaged by its removal.

Maintaining the GMO moratorium until 2019 enables all Tasmanian primary producers to continue to research, and establish, new GM-free export markets for Tasmanian food products. The State's on-going GM-free status gives SME's the ability to pursue markets that would otherwise be closed to them. These markets are of no interest to large-scale producers of food crops which are classed as "commodities".

All export markets currently have complete confidence in the GM-free status of Tasmanian primary products, and do not require the producers to undergo testing to prove their product's GM-free status. There has been a documented increase in demand for Tasmanian food products from Japan, China and other Asian markets since the government announced the continuation of the GMO moratorium in 2014. Tasmania's enhanced food and agricultural reputation is underpinned by its GMO-free status, with its fruit fly-free status being an added benefit (advantage).

Any change in status of Tasmanian agricultural products from non-GM to GM, will result in at best a decrease, and at worst the complete loss, of one or more existing export market(s) if there is a change of government policy, or consumer sentiment, in those markets from pro- to anti-GM. Tasmanian primary producers will no longer have complete freedom of choice as to the export markets they pursue. Their options will be determined solely by the GM legislation applicable in each export market.

Slow Food believes that allowing GM-food and animal feed risks transforming our food into a patented commodity controlled by a few multinationals, thereby stripping farmers and consumers of their rights, and choices. These companies determine the distribution and patenting of GM-seeds, as well as associated herbicides. Ultimately the entire food chain of GM-crops is controlled by a handful of global companies. It is well documented that small producers around the world continue to be significantly disadvantaged by the introduction of GM-crops.

(see Food Inc Vimeo.com/23607359; http://stopthecrop.org/whats-wrong-gm-crops)

"Manufacturing" a handful of GM-crops is at complete odds with the pressing requirement to maintain the maximum genetic diversity of food crops and products, in order to have any chance of meeting future food requirements. This has become more challenging as increasing numbers of agricultural enterprises around the world experience changing and/or increasingly extreme, climatic conditions. Utilising the most diverse gene pool of wild strains of food plants, traditional crops and local varieties, in combination with modernised "traditional" plant breeding techniques, is well documented as being the most sustainable (and cheapest) way of achieving this goal.

Productivity Commission Draft Recommendation 6.1

This appears to simply be a restatement of the overarching view put forward by the Federal government in the Agricultural Competitiveness Review, that "farmers should have the choice to adopt approaches that best suit their business". This laissez faire approach cannot be applied to GM technologies. GM-technology requires constant monitoring and government regulation since water, wind and insect pollinators do not respect "exclusion zones". Insect pollinators do not know that if they visit a GM-crop before foraging for GM-free Manuka or Leatherwood Honey, they will endanger the GM-free pollen status of premium Tasmanian honey exports.

GMO-ID Australia, affiliated with Cert-ID UK, provides an independent non-GM status certification service. When West Australia started GM-Wheat field trials, the company reported increasing enquiries from Germany about the GM-status of all Australian wheat imports. A primary producer can install an Identity Preservation (IP) Program, confirming they are non-GM, via an independent testing laboratory. Producers can obtain this IP status, without incurring the cost of this testing, if they are located in a non-GM area. Tasmanian primary producers currently meet these criteria. There is no need to change Tasmania's GMO-free status, so these enterprises, and Tasmania's economy as a whole, should not have to incur any such extra costs.

If Tasmania's GM-free status were to lapse, the immediate disastrous consequences for enterprises currently servicing premium overseas GM-free markets can be clearly demonstrated by the impact on the premium Tasmanian Leatherwood Honey export sector. In 2012 the EU Court of Justice reclassified "pollen as a natural constituent of honey". If honey shipments are tested and found to contain >0.9% GM- pollen, that honey has to be re-labelled as GM, and pollen has to be listed as an ingredient. If a number of shipments then "register" GM pollen, albeit at <0.9%, EU law requires that the producer declare that the GM-pollen has made their honey GM. Pollen from GM plants is then only permitted into the EU if those plants have been authorized for food use in the EU. Any change in the GM-free status of Tasmanian honey would result in the closure of current GM-free export markets in the EU. Since Tasmanian beekeepers continue to experience demand that regularly outstrips supply for their GM-free honey, any change in Tasmania's GM-free status would be an unnecessary, and extremely retrograde step.

Clearly, Tasmania's agricultural export markets that require imports to be guaranteed GM-free do not consider that GM and non-GM production systems can co-exist. Tasmania's limited land mass makes it almost impossible to "contain" GM crops and prevent them cross-contaminating non-GM crops. Honey producers are required to sign a contract with packers stating that their honey is GM-free (i.e. GM-pollen free). If Tasmania's GM-free status were to change this would be impossible, since GM-canola growers are currently not required to publicly declare the locations of their crops.

Once GM material enters an agricultural area, producers who have established GM-free markets are required by those markets to incur the cost of testing their products to guarantee that their own crop is still GM-free. These enterprises should not have their profit margins eroded by incurring any such monitoring costs as imposed by their customers. The Federal Government would have to reimburse these producers for all the costs they incur in proving that their products are still GM-free, as required by their export markets. In addition, the legal liability of seed companies &/or growers, whose GM-crops cross contaminate non-GM crops would have to be resolved. The current situation, whereby the non-GM grower has to bear the cost of any GM-contamination of their crop could not legally be allowed to continue.

Current modeling clearly shows the likely increasing incidence of extremely strong winds, and unusually heavy rainfall events, across Tasmania. These, combined with Tasmania's limited landmass, make the concept of "exclusion zones" around GM-crops meaningless. The June 2016 rainfall event in north/north-west Tasmania is a classic example. Latrobe farmers are now dealing with the consequences of the Mersey River having completely changed its course in some places. The floodwater dumped tonnes of river shingles on paddocks that previously grew

potatoes. Fences across the whole area are festooned with rotting vegetation. If Tasmania were not GM-free, it would be impossible to determine how much of this debris was from GM-crops, let alone where it originally came from, and thus who was responsible for any cross-contamination. If not rectified –a task well beyond the budgets and expertise of the affected farmers – the river will, in future flooding events, flow through the middle of three farms. What chance then of preventing GM-crops from cross-contaminating designated GM-free areas?

Another ill-conceived concept is that of non-food GM crops being grown alongside non-GM food crops. Diversified farming enterprises often grow both potato and poppy crops. If GM-poppy seed became the only available option, these producers would be unable to practice that mainstay of good agricultural practice - paddock & crop rotation. The impacts of cross-contamination due to insect pollination and rainfall events are also obvious.

During and immediately after the 2013 GMO moratorium review in Tasmania, the Australian dairy processing sector was one of the most vociferous critics of the inability of Tasmanian dairy farmers to plant GM-Ryegrass pasture. Opponents pointed to the potential for such extensive GM-pasture planting to easily cross-contaminate many non-GM crops, since in Tasmania's limited landmass it would be extremely difficult to maintain exclusion zones around such broadscale plantings. Now, the Australian Dairy Products Federation is stressing caution around the potential use of GM-pastures, since their use has the potential to provide a non-tariff barrier for Australian milk products.

Introducing GM-seed to an environment is an instantaneous act, but reversing the consequences of that act is almost impossible. Decision makers should be mindful of the fact that, although GM-Canola seed trials ceased in Tasmania in the late 1990's, the Tasmanian government is still monitoring the trial sites ~20 years later. GM-plants are still having to be removed and destroyed, while the land is still unavailable for any other form of food production.

Agritourism is a booming sector of the Tasmanian tourism industry with the State's GM-free status currently a valuable point of difference in the sector's marketing strategy. This economic activity should not be jeopardized.

We are now in an era when many countries promote their primary products as "clean and green", often under extremely dubious circumstances. What has become a worthless slogan must now be backed up by hard evidence – a complete Moratorium on GM-food and animal feed – in order for it to once again have any real meaning for consumers.