

14 April 2022

Dr Raj Bhula  
The Office of the Gene Technology Regulator  
MDP 54 GPO Box 9848  
Canberra ACT 2601

Via Email: [ogtr@health.gov.au](mailto:ogtr@health.gov.au)

Dear Dr Bhula

**RE: Reg-003; a proposal to include dealings with GM canola on the GMO register**

I write in response to the consultation Risk Assessment and Risk Management Plan (RARMP) on the consideration to include MON-00073-7 canola on the Genetically Modified Organism (GMO) Register.

Grain Trade Australia (GTA), on behalf of its members, welcomes the opportunity to comment on the consultation RARMP on the consideration to include MON-00073-7 canola on the GMO Register. GTA supports the science-based approach employed by the Office of the Gene Technology Regulator (OGTR) in relation to regulating commercial transactions with viable GMOs.

**About Grain Trade Australia (GTA)** – GTA is a national association and is the focal point for the commercial grains industry within Australia. The role of GTA is to provide a framework across Industry to facilitate and promote the trade of grain. GTA facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy and commercial support services to the Australian grain value chain. GTA Members are responsible for over 95% of all grain storage and freight movements made each year in Australia. Over 95% of the grain contracts executed in Australia each year refer to GTA Grain Trading Standards and/or Trade Rules.

GTA has established the Australian Grains Industry Code of Practice. All GTA Members are required to adhere to the Code of Practice. GTA Members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA has over 260 organisations as Members. Their businesses range from regional family businesses to large national and international trading/storage and handling companies who are involved in grain trading activities, grain storage, processing grain for human consumption and stock feed milling. A list of GTA Members is in this [\(Link: here\)](#).

This consultation and the consideration by the OGTR are no doubt in recognition of the safe use of MON-00073-7 canola during the 14 years it has been commercially cultivated in Australia. It is noted during this period Bayer has had oversight of critical stewardship activities focussed on reducing the risk of adverse effects to the environment under the existing OGTR license conditions.

Ongoing stewardship of MON-00073-7 after it is placed on the GMO Register is of concern to GTA and further dialogue and discussion is required by Government and industry participants to ensure its ongoing safe use. This matter and potential trade and market access risks will be discussed in GTA Technical Committees including the Plant Breeding for Innovation Committee and the Trade & Market Access Committee.

After this dialogue with GTA members GTA may propose actions and activity to progress as a means to ensure there is ongoing critical stewardship activities for MON-00073-71 and future products listed on the GMO Register.

Thank you for your consideration of this submission and I am available to answer any queries or provide additional information if necessary and required.

Yours faithfully,

A handwritten signature in black ink, appearing to read "P O Shannassy". The signature is fluid and cursive, with the first name "P" and last name "Shannassy" being more prominent.

**Pat O'Shannassy**  
**CEO**