

GMOs:
the wisdom of crowds &
the folly of deregulation

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**Parliamentary Forum:
GMOs: Regulation or Deregulation
Parliament House
Canberra
30 July 2019**

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The push to deregulate some GMOs



Gene Technology Amendment (2019 Measures No. 1) Regulations 2019

I, General the Honourable Sir Peter Cosgrove AK MC (Ret'd), Governor-General of the Commonwealth of Australia, acting with the advice of the Federal Executive Council, make the following regulations

These regulations:

- * water down the definition of GMOs
- * have Australia going it alone in the world
- * risk damaging Australian food and agriculture

Bad Science

CANE TOADS Pest Invasive species



The cane toad which was captured near Sydney.

HAVE WARTS, WILL TRAVEL

A CANE toad caught near Sydney has sparked fears the invaders could be adapting to cooler weather and spreading south, further threatening the country's unique wildlife.

A local family caught the adult male toad — which has a highly poisonous venom often fatal to predators — about 50km north of Sydney, the first time one had been found wild in the area, the Australian Reptile Park said.

Conservationists fear the

tough pest, introduced from Central America in 1935 to control beetles in sugar cane fields, may be adjusting to the climate in southeast Australia amid a mild winter.

“To find one in the middle of winter at a dam croaking ... is a concerning sign,” Park manager Tim Faulkner said.

The toad is spreading across northern Australia at an estimated 40-60km a year. It is estimated to be moving south at 3-4km a year.

“Could a mistake like the cane toad fiasco happen again?”

EDITORIAL

Grenfell Tower Fire: Mindless Deregulation, Senseless Harm

By The Editorial Board

June 22, 2017



Fire engulfing Grenfell Tower in London on June 14.

Bad Deregulation

Feedback...

*“This is the biggest threat
to food and agriculture
that we have ever faced”*

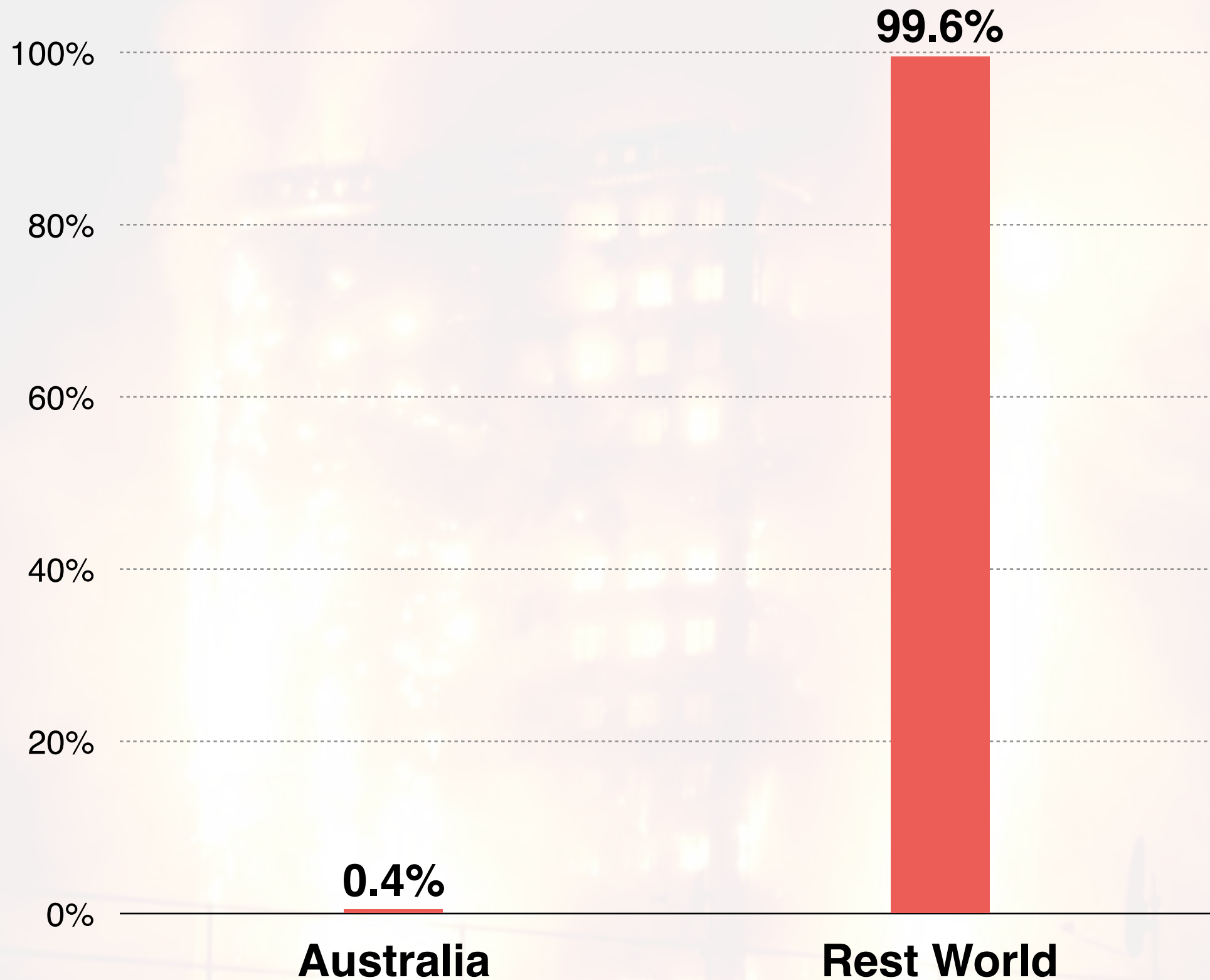
Why?

Feedback...

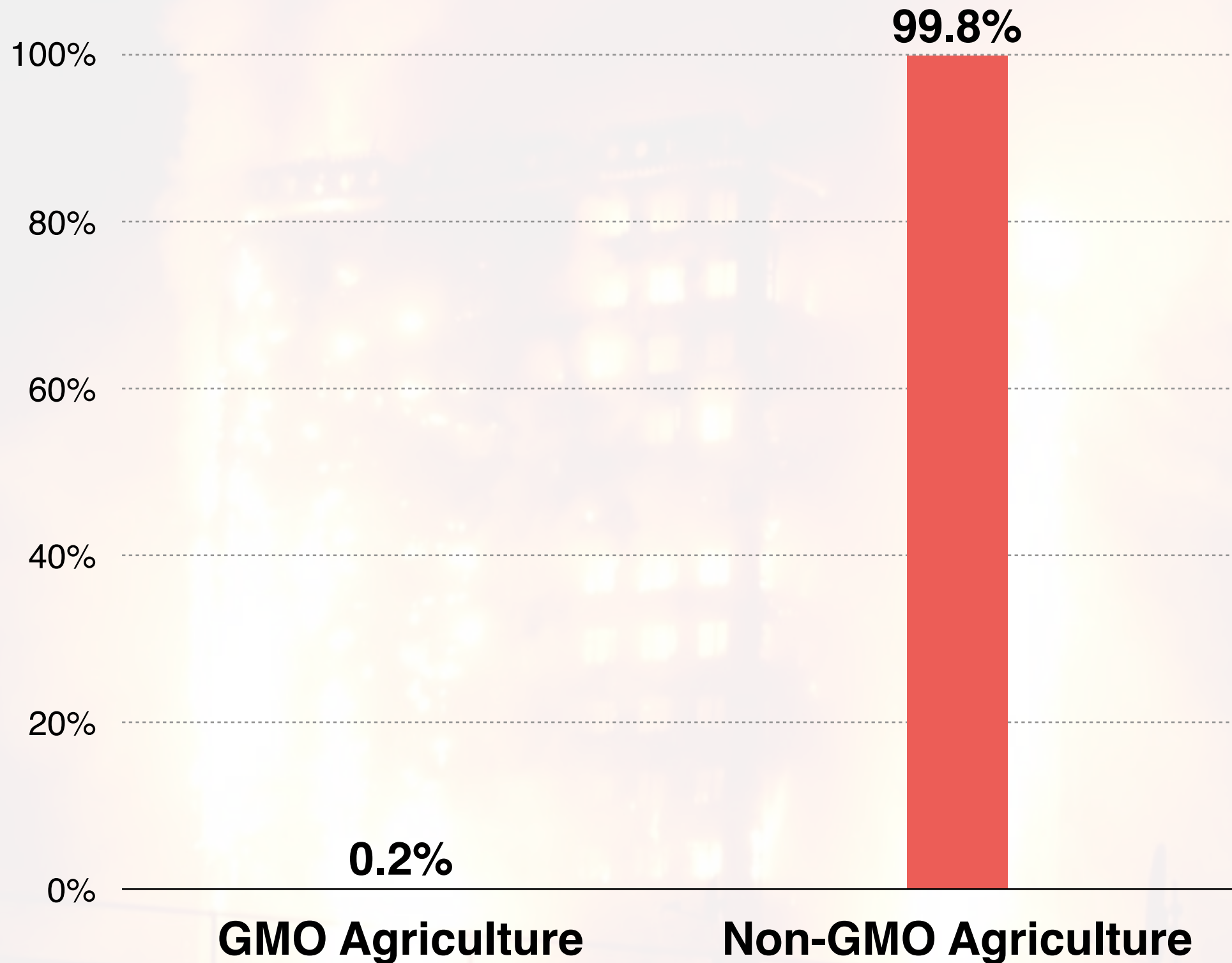
“It is a totally daft idea”

Why?

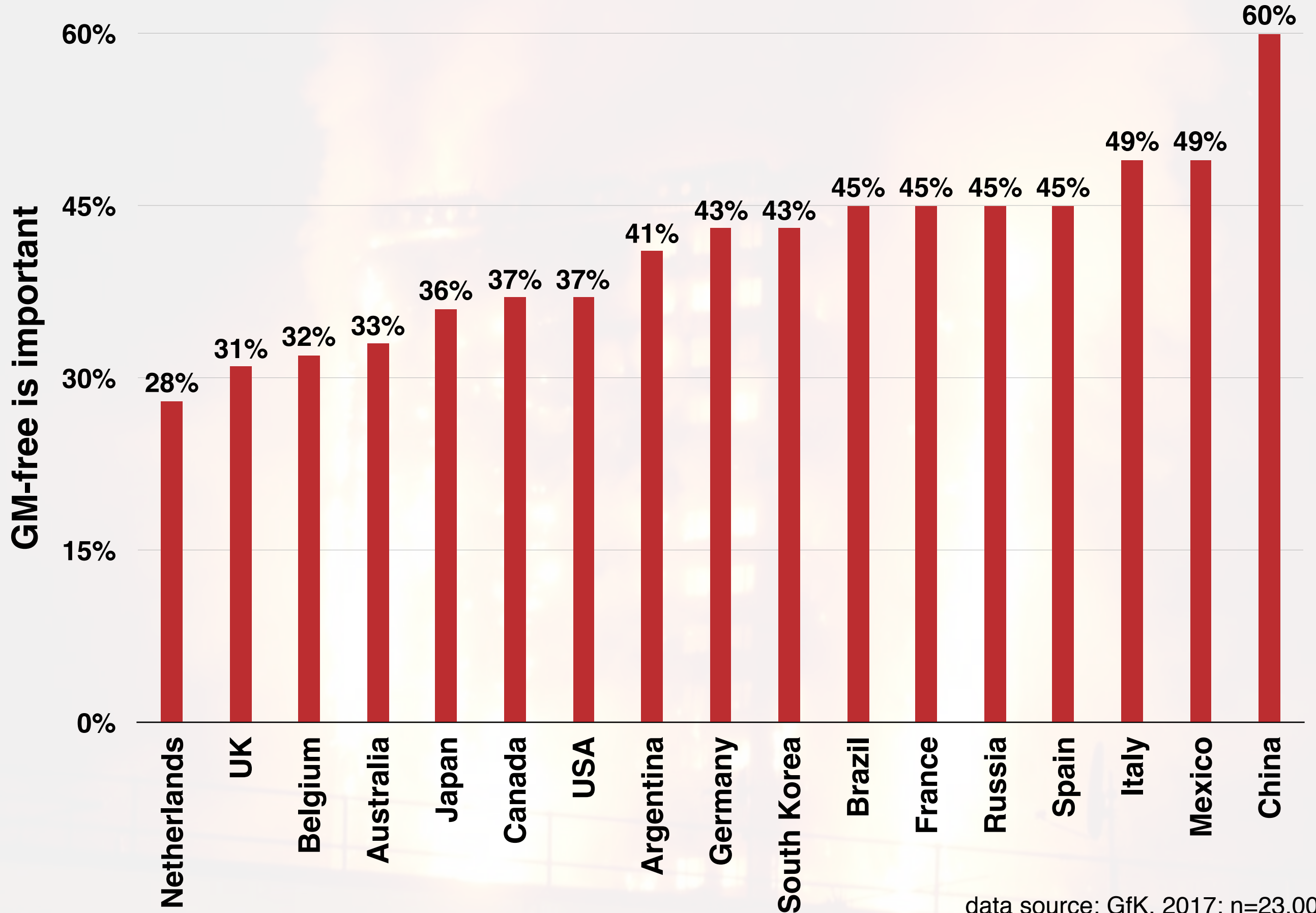
World GMOs (ha)



Australian GMOs (ha)



Food shoppers don't want GMOs



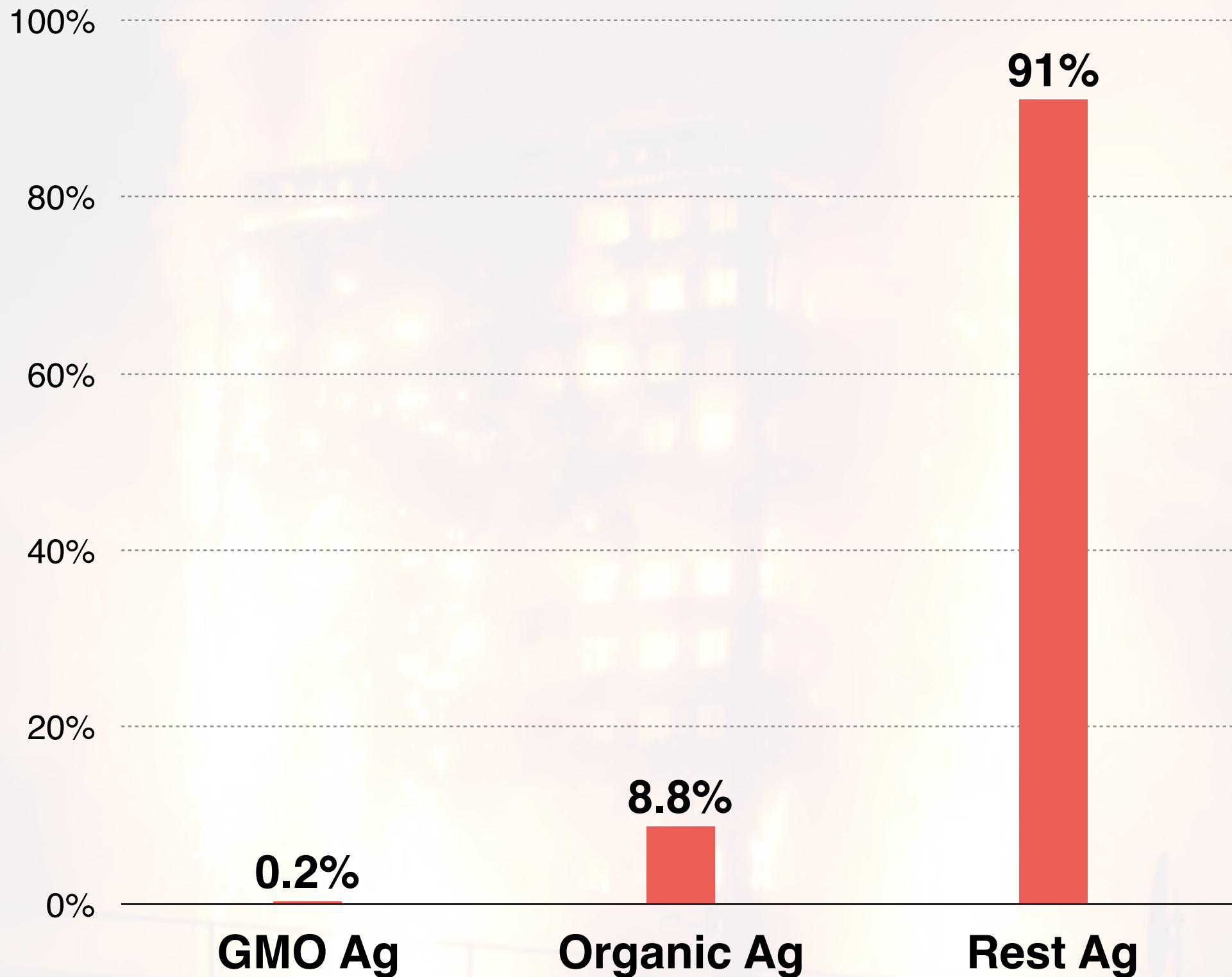
data source: GfK, 2017; n=23,000

Chinese shoppers want clean & green

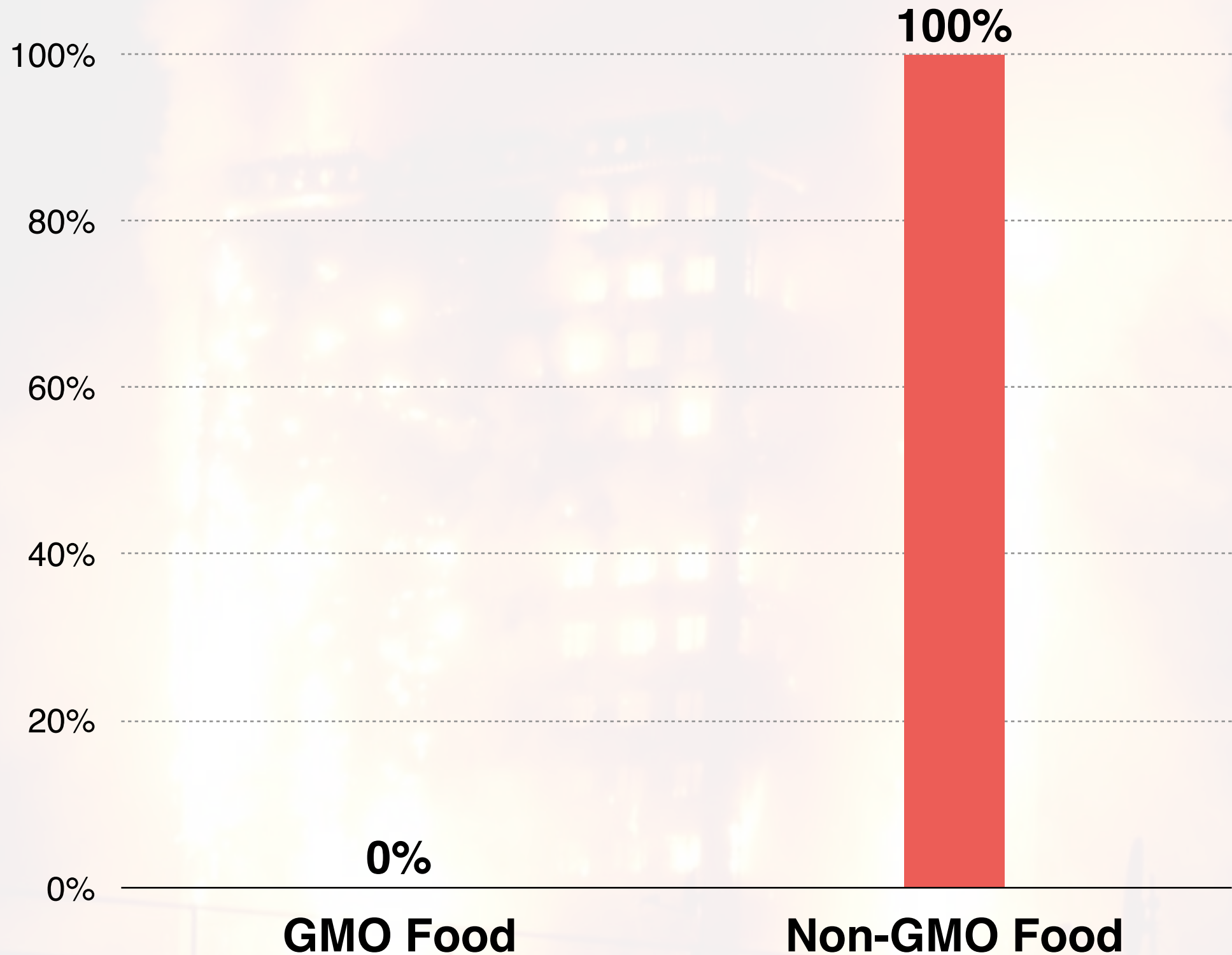


Wuhan, China, photo: J Paull

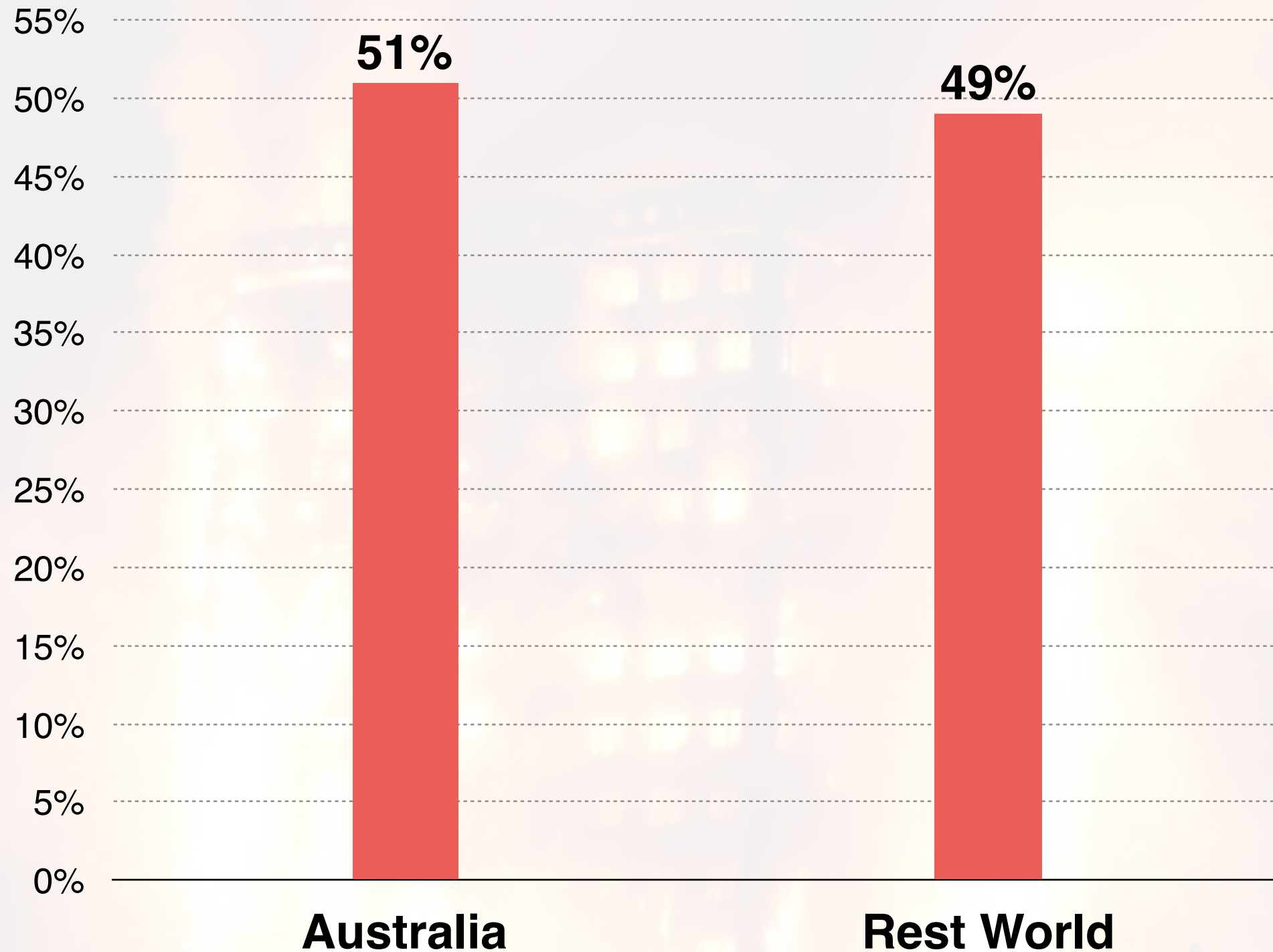
Australian Agriculture (ha)



Australian Supermarkets



World Organics (ha)

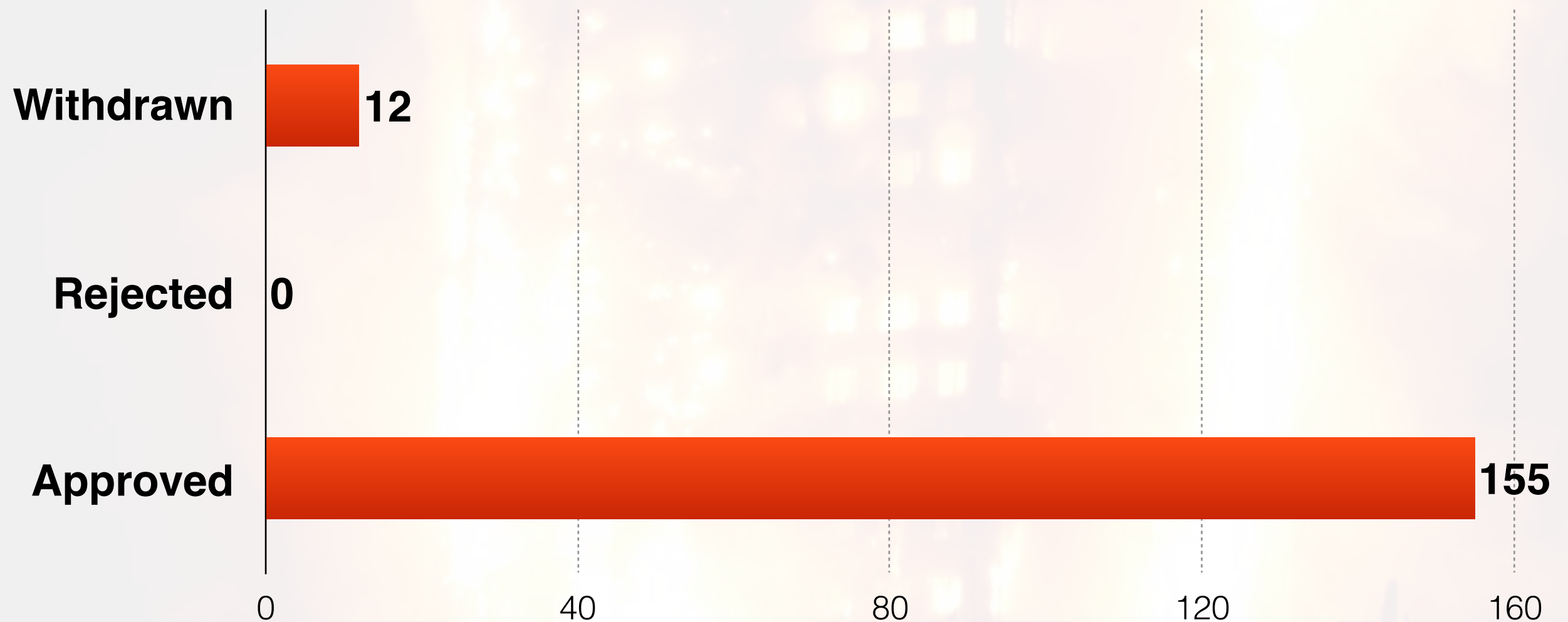


- * Zero tolerance for GMOs
- * 22% growth pa for past 5 years

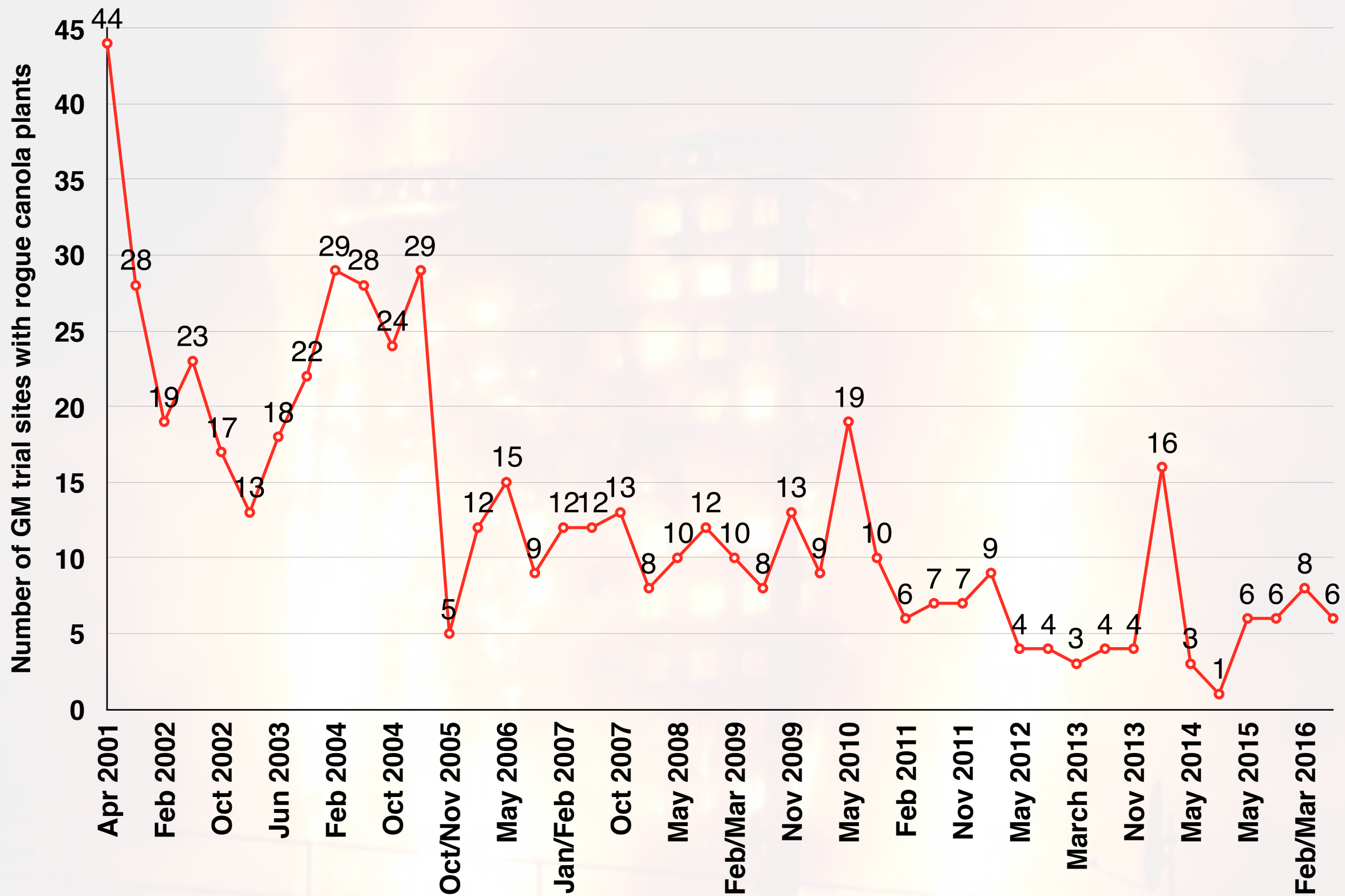
OGTR oversight of GMOs

Office of the Gene Technology Regulator

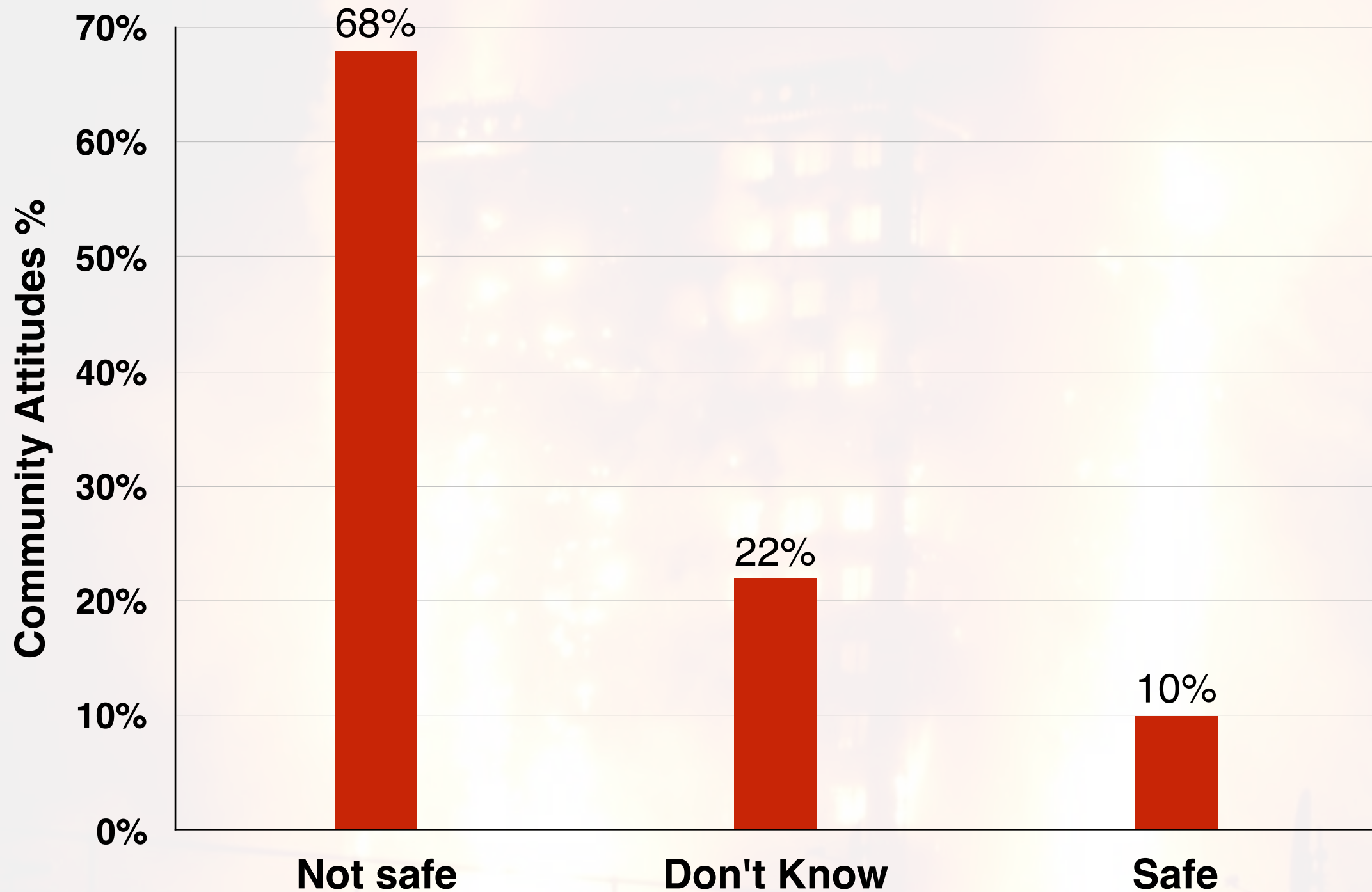
167 Applications (2001-2019)



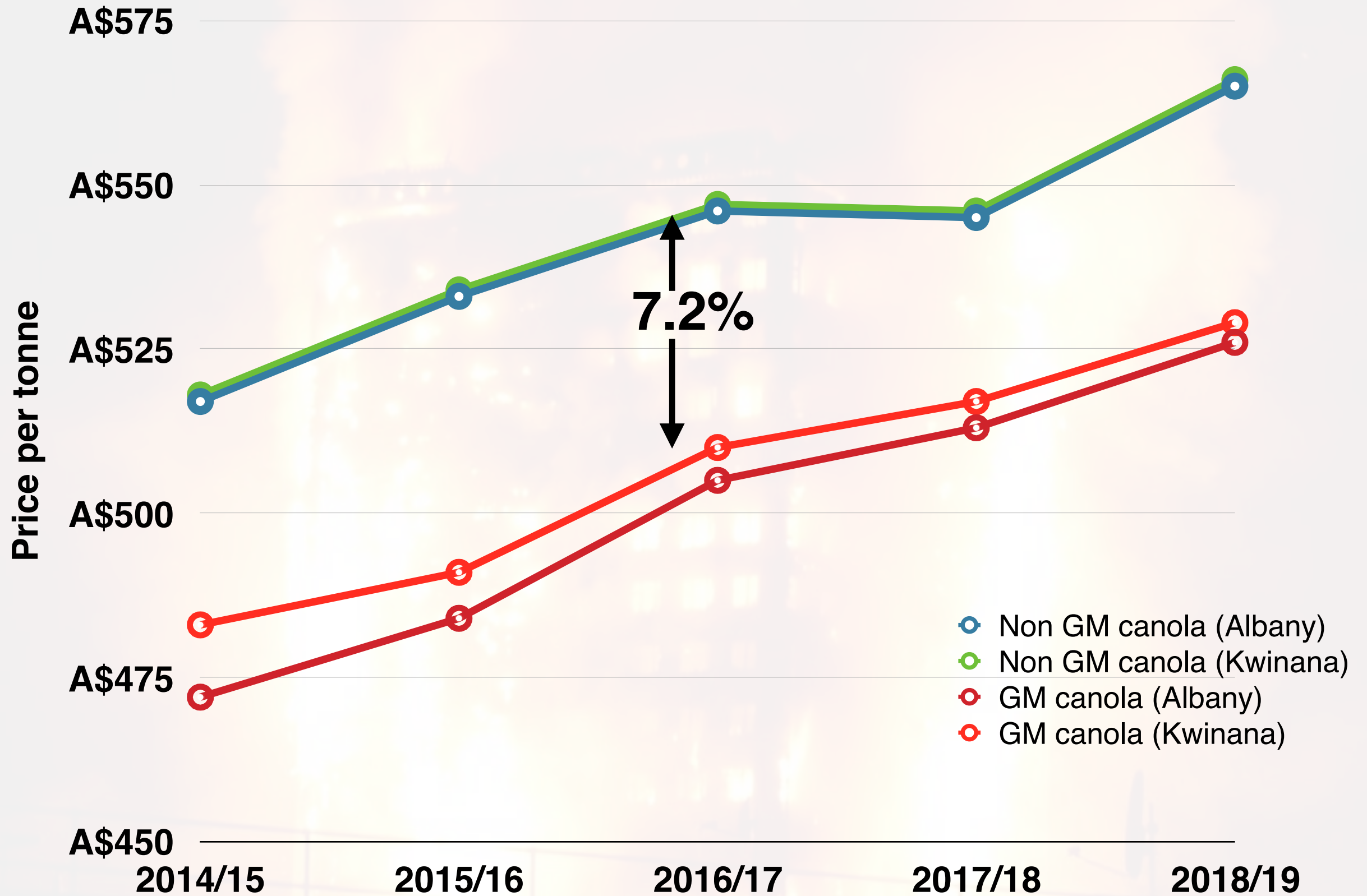
Rogue GMOs in Tasmania - 2 decades



Australians say GMOs “not safe”



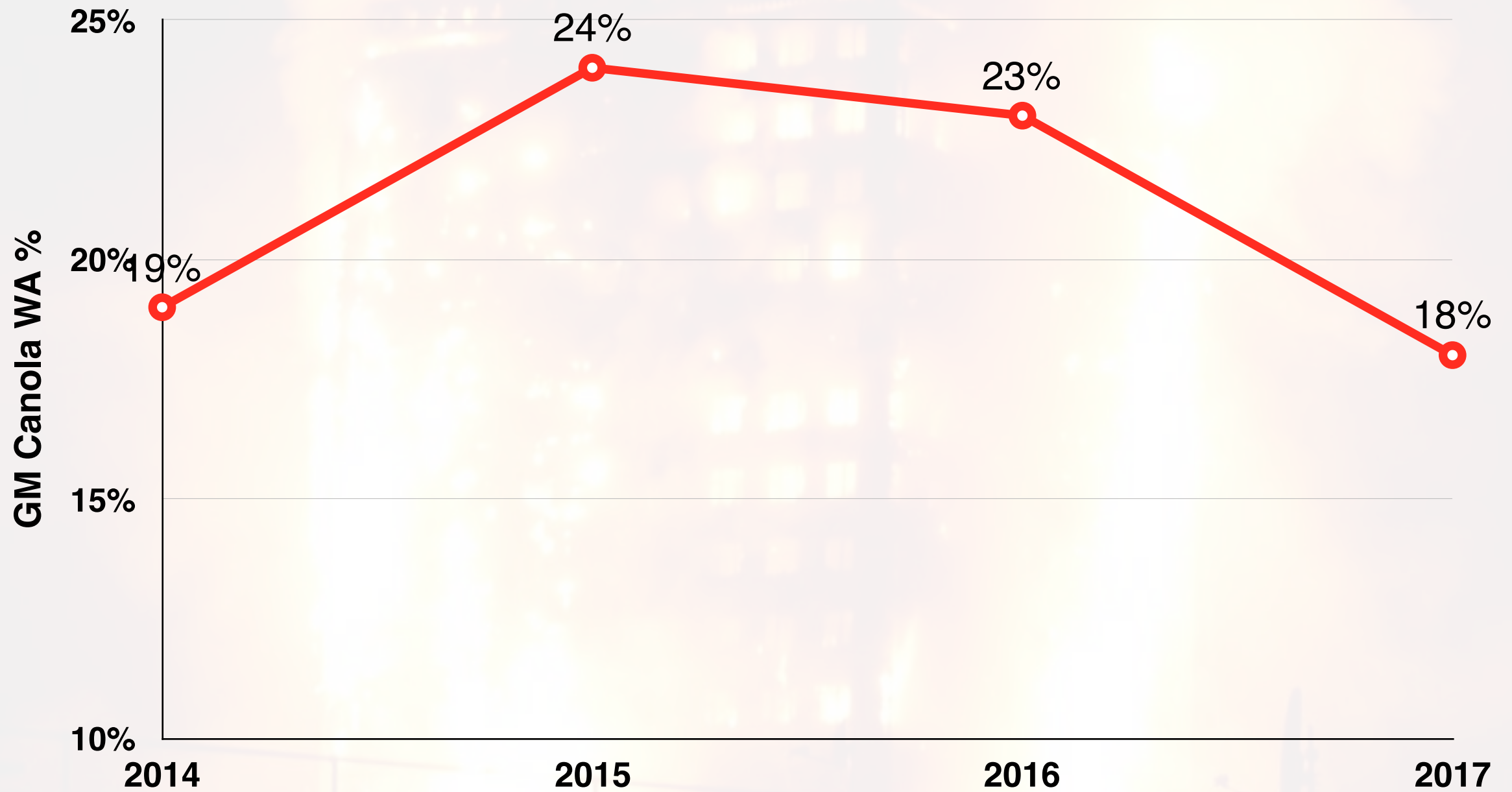
Price Penalty for GM Canola = 7.2%



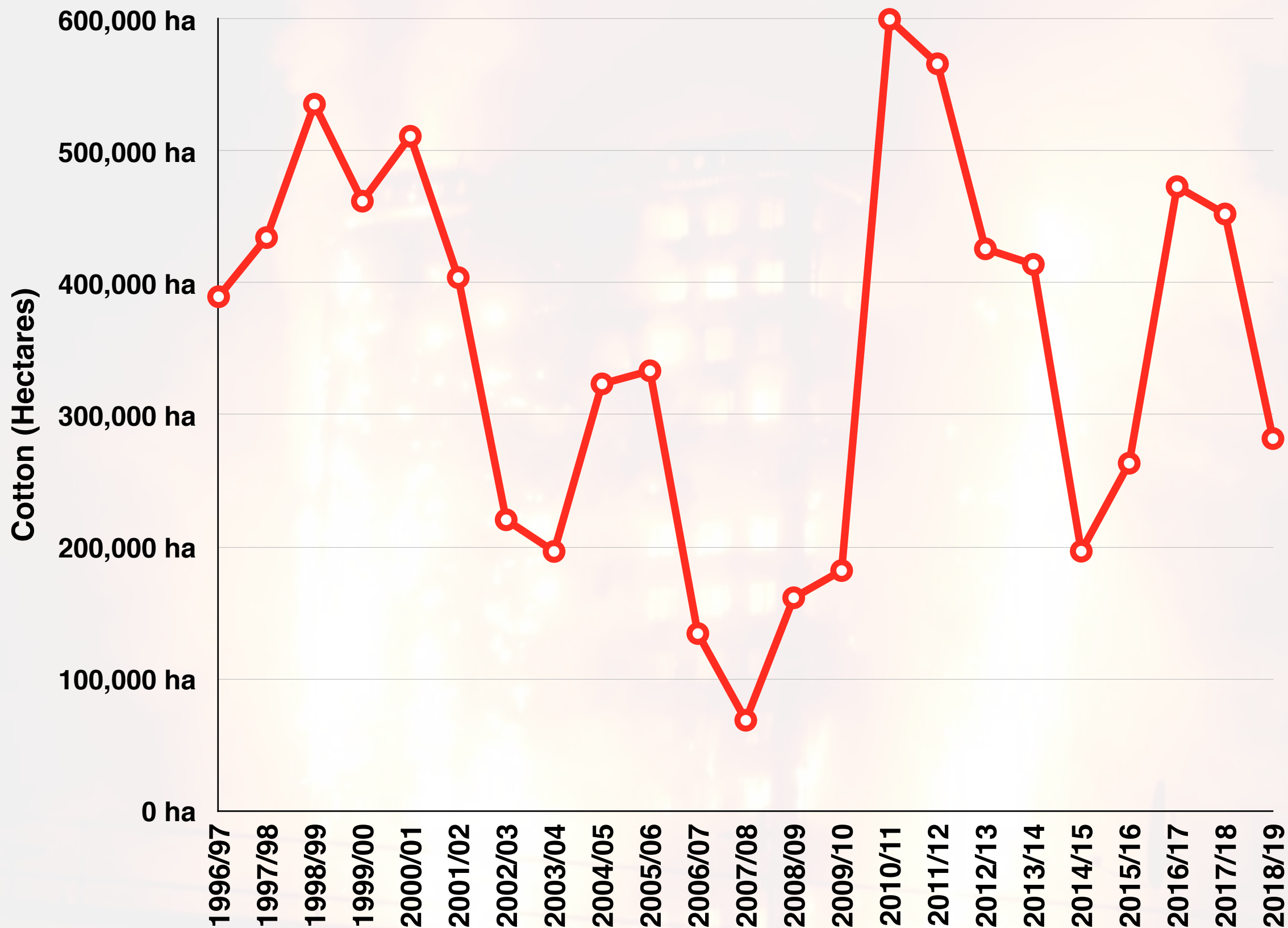
Ghost GMOs in WA

Canola Grade	Marketing Description	Specified Characteristics	Fair Description
CAN	“Non GM Canola”	“Certified GM free to Maximum adventitious presence of 0.9% GMO. Suitable for Human Consumption and Biodiesel production. ISCC EU Certified”.	Canola with GM contamination $\leq 0.9\%$
CAG	“Canola”	“Suitable for Human Consumption and Biodiesel production. ISCC EU Certified”.	GM Canola

GM canola in WA % - decline



GMO cotton - Australia - erratic



Substantial Equivalence

The lie that underpins the GMO industry:



Regulators
“same”

Patent Office
“novel, unique,
different, a real invention”

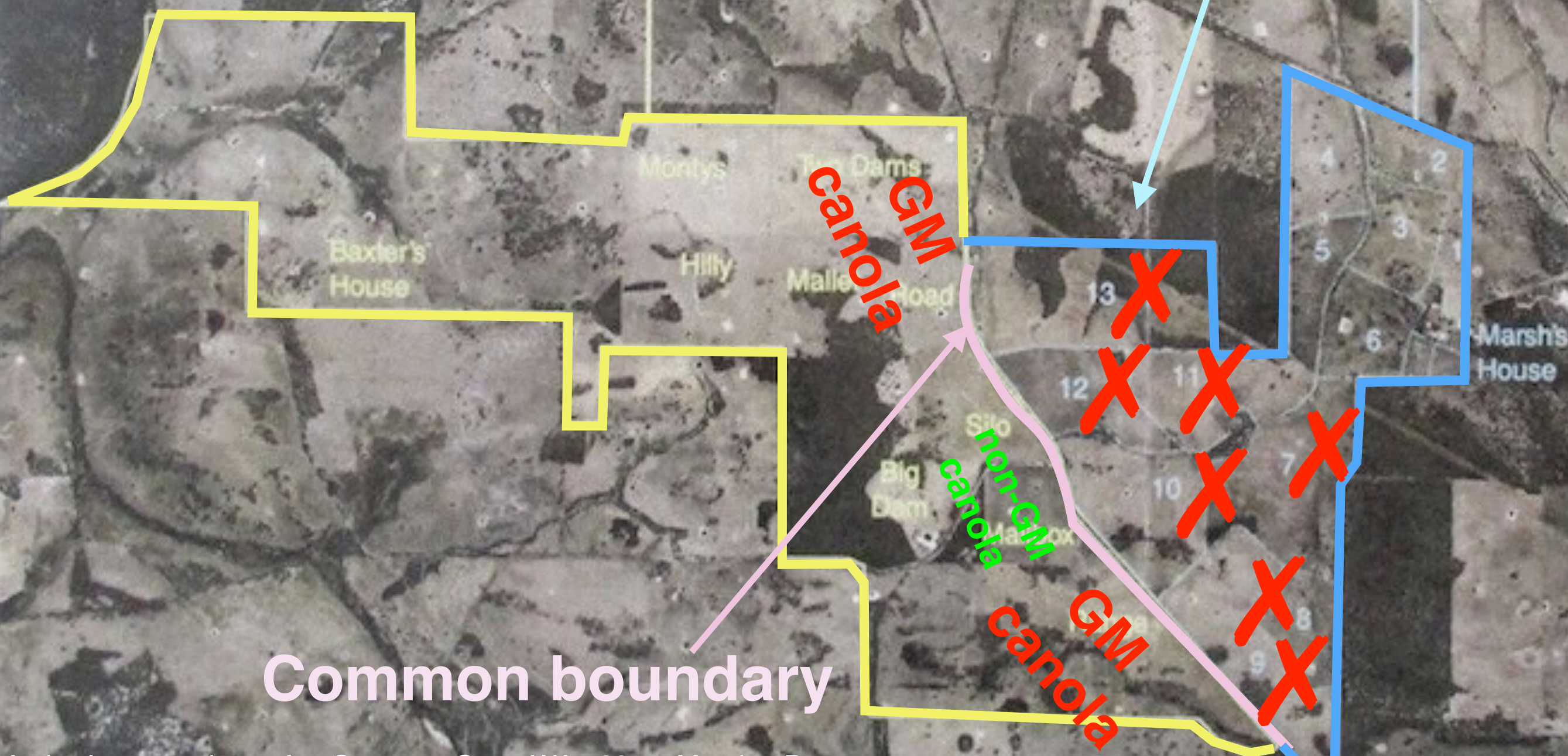
2010 @ Kojonup, WA

**Baxter
GMO
900 ha**

**Marsh
Organic
477 ha**

Sevenoaks

Eagle Res



Common boundary

Canola GM

non-GM canola

canola GM

Author's annotations after Supreme Court WA, 2015, Marsh v Baxter

What is Genetic Engineering?

**Genetic Engineering is what
genetic engineers do**

Is it a GMO?

- From a GM lab
- By a GM engineer
- Published in a GM journal
- Patented life form

Monsanto

Cargill

Syngenta

Bayer

BASF

Dow

CSIRO

UQ

QUT

RMIT

Murdoch Uni

U Adelaide

UWA

Sugar Research Aust

VicDEDJTR

VicDPI

>Profits

>Budget

A

**phenomenon
of the times -
the distrust of
'experts'**

People

Parents

Workers

Voters

Shoppers

Consumers

>Health

>Well being

>Family

>Safety

>Cuisine

GMO Smugglers Delusion

1. We can smuggle GMOs into the Australian supply chain
2. They'll never know
3. They'll never find out

Oh yes they will!

GMO Triple Jeopardy

- 1. Not regulated**
- 2. Not declared**
- 3. Law of unintended consequences**

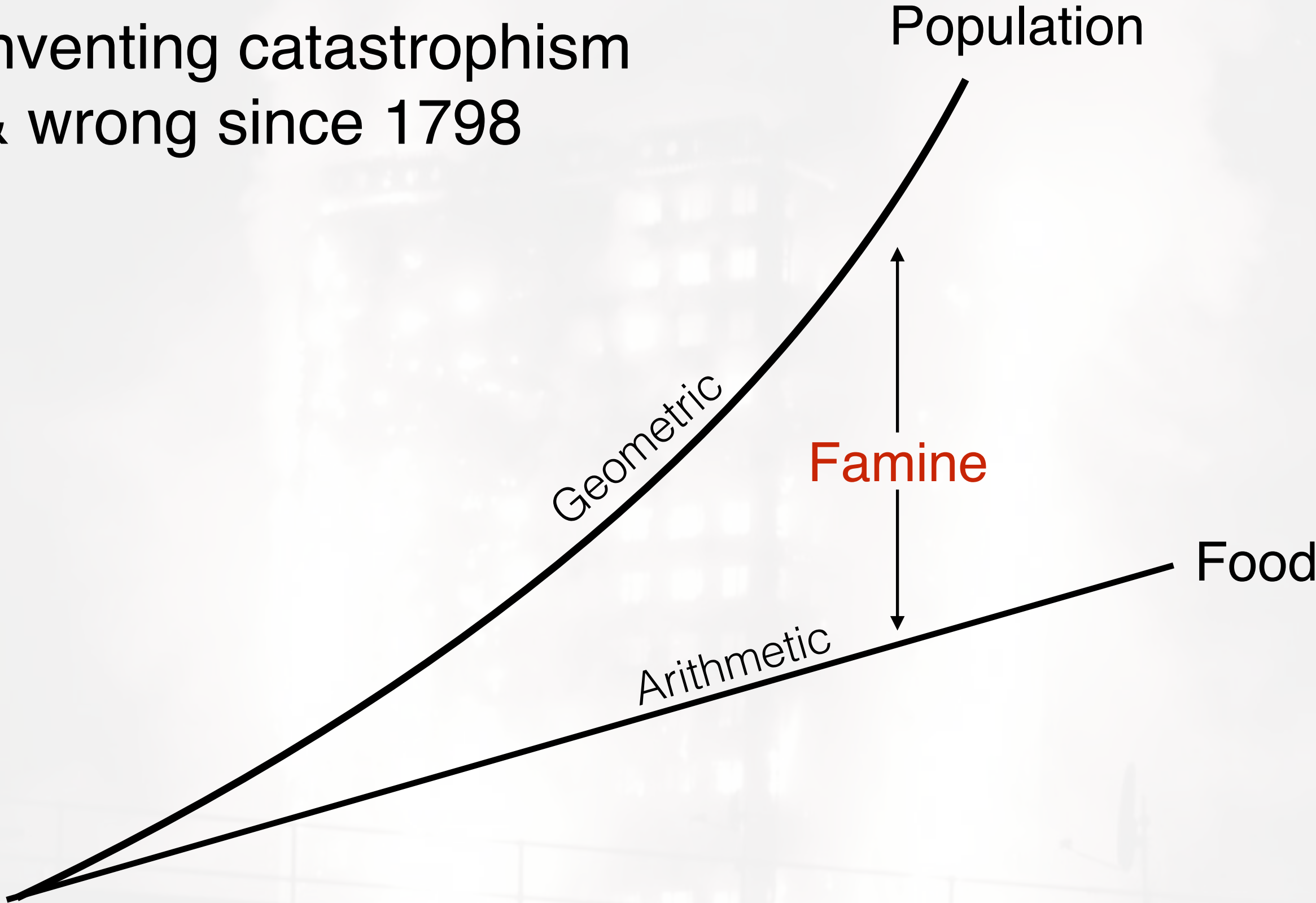
GMO Exceptionalism

5 new techniques

50 new techniques coming



Thomas Malthus -
inventing catastrophism
& wrong since 1798



The push to deregulate some GMOs



Gene Technology Amendment (2019 Measures No. 1) Regulations 2019

I, General the Honourable Sir Peter Cosgrove AK MC (Ret'd), Governor-General of the Commonwealth of Australia, acting with the advice of the Federal Executive Council, make the following regulations

Disallow these regulations:

- *to avoid** watering down the definition of GMOs
- *to avoid** going it alone in the world
- *to avoid** damaging Australian food and agriculture

Summary

1. Bad science (e.g cane toads, asbestos, smoking, Fukushima et al)
2. Bad deregulation (e.g Grenfell Tower, Lacrosse Apartments)
3. Only 2 crops: GM canola & GM cotton
4. Aus GM canola (491,528 ha)
5. Aus GM cotton (282,000 ha)
6. Aus Organic agriculture (35,645,038 ha)
7. Australian GMOs = 0.4% of world GMOs
8. Australian GMOs = 0.2% of Australian agriculture
9. Australian Organic Ag = 51% of world Organic Ag
10. The foundational lie of GM = 'Substantial equivalence'
11. OGTR regulates release of GMOs in Australia
12. OGTR has never denied an application (n=167)
13. World shoppers do not want GMOs (n=23,000)
14. Australians say GMOs are not safe (n=1225)
15. GM contaminates (Tas, WA, Marsh v Baxter)
16. GM price penalty = 7.2%
17. GM is what GM engineers do
18. Monsanto is not going to save the world!
19. Deregulation - think Grenfell Tower
20. Just say NO to GM secrecy
21. Just say YES to GMO transparency & regulation
22. Disallowing the GMO Amendment protects Aus Food & Agriculture

Thank you
Questions

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GMOs: the wisdom of crowds & the folly of deregulation

John Paull

Abstract

Australia's Office of the Gene Technology Regulator (OGTR) is pushing to change the definition of genetically modified organisms (GMOs). The proposed changes would remove from regulation some GMOs that are presently subject to regulation by the OGTR. At present GMOs are subject to risk analysis, to safety evaluations, and to GM labelling if used in food. The proposed regulations, if they are not disallowed by the Australian Parliament, will water down the definition of GMOs in Australia, will have Australia applying definitions of GMOs that are different from major trading partners, and they risk damaging the clean and green export reputation of Australia's food and agriculture sectors. The GM proposed deregulation would be bad science and bad deregulation. Australia is a minnow in the world of GMOs, accounting for just 0.4% of the global GMO agricultural hectares. GMOs account for just 0.2% of Australia's agricultural hectares. Food shoppers of the world reject GM food, led by Chinese consumers of whom 60% reject GM food. OGTR figures reveal that only 10% of Australians agree with the proposition that GMOs are "safe". GMOs require labelling in Australia, and a direct consequence is that there are no GM food products on Australian supermarket shelves. The global GMO industry is founded on the lie of "substantial equivalence" where GM proponents insist to regulators that their GMO is the "same" as the organism from which it is derived, but to the Patent Office that their GMO is "novel, unique, different, and a real invention" and that it thereby warrants patent protection. Recent failures of deregulation, including London's Grenfell Tower, Melbourne's Lacrosse Apartments, and Sydney's Opal Tower, highlight the follies of deregulation, and the reality that deregulation privatises profits and socialises costs. The case has not been made for deregulating of GMO in Australia, and there are substantial uncalibrated costs, risks and downsides for Australia's food and agriculture exports industry. The proposed regulations ought to be disallowed.

Keywords: Gene Technology Amendment (2019 Measures No. 1) Regulations 2019, Genetically modified organisms, genetic engineering, biotechnology, regulation, safety, GM canola, GM cotton, patents, Marsh v Baxter, exceptionalism, smuggler's delusion, triple jeopardy.