



Australian Academy of  
Technology & Engineering

**Joint Academies Submission to the consultation on *Implementing Recommendations of the Third Review of the National Gene Technology Scheme: Phase 1.***

The Australian Academy of Science and the Australian Academy of Technology and Engineering (jointly, “the Academies”) welcome the opportunity to provide a submission to the consultation on *Implementing Recommendations of the Third Review of the National Gene Technology Scheme: Phase 1.*

The Academies strongly support the objectives for streamlining the gene technology system as outlined in the discussion paper.

The Academies support a flexible regulatory arrangement that allows the Gene Technology Scheme to respond to new technological developments and accumulated experience. As noted in previous submissions, the present system presents barriers to technological development and to adoption of the technology.

The Academies support the objectives of the definitional changes as outlined in the discussion paper. Regulatory flexibility in the Scheme and its supporting legislation is important, and the Academies support principles-based, flexible legislation with purposive definitions. Operational detail should be delegated to subordinate instruments, including the regulations supporting the Act.

The Academies support the objectives of risk proportionate regulation as outlined in the discussion paper. There are clearly applications of gene modification technology that present no greater danger than equivalent conventional (non-GM) technology. Over-regulation of low-risk gene modification technologies restricts research and technology development.

The Academies strongly favour a regulatory system that responds to new information, a reduction of regulatory burden for applications that present few practical risks, and appropriate regulation for applications identified as high risk. This risk assessment should be scientifically informed and scientifically justifiable. Risk assessments should be made public as a matter of course, and subject to public scrutiny. The regulator must be able to respond rapidly to changes in information when necessary.

If you would like to discuss any aspect of this submission, please contact Dr Stuart Barrow, Senior Policy Analyst, Australian Academy of Science ([stuart.barrow@science.org.au](mailto:stuart.barrow@science.org.au)) or Ms Alix Ziebell, Principal Policy Analyst, Australian Academy of Technology and Engineering ([Alix.Ziebell@atse.org.au](mailto:Alix.Ziebell@atse.org.au))