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19 March 2019

Hon Tim Whetstone MP
Minister for Primary Industries and Regional Development
10/1 King William Street
ADELAIDE SA 5000

By email: Minister.Whetstone@sa.gov.au

Dear Minister

RE: The commercial cultivation of genetically modified crops on Kangaroo Island

As you are aware, Grain Producers SA (GPSA) has been considering the findings of the Independent Review of the Moratorium of GM Food Crops, since the report was released on 20 February 2019.

In its written submission to the public consultation on the report, GPSA identified the need for targeted consultation with growers on Kangaroo Island in relation to findings 2.2 and 4.4 respectively.¹

GPSA has since held a public forum for primary producers on Kangaroo Island, to discuss the findings from the Independent Review and to find a way forward for local primary producers, should the current moratorium on the commercial cultivation of genetically modified crops be lifted.

The Forum was held on Friday, 15 March 2019 at Parndana, with the assistance of Primary Producers SA, Livestock SA, and local farmer group Agriculture Kangaroo Island (AgKI). Representatives from KI Pure Grain and the Department of Primary Industries and Regions were also present. Prior to this forum, GPSA met independently with KI Pure Grain.

I am writing to inform you of the outcomes of our consultation.

GPSA strongly believes that producers should have the freedom of choice to grow the cereal, legume and oilseed varieties that best fit their farming system. GPSA also fully supports producers taking advantage of the unique marketing opportunities on Kangaroo Island. We commend the efforts of KI Pure Grain in establishing a niche market to supply non-GM canola produced on Kangaroo Island to a customer in Japan.

The Forum revealed that this contract may be jeopardised if GM crops are able to be cultivated on Kangaroo Island. In addition, it was conveyed to GPSA that current GM crops offer little in the way of agronomic benefits for the small number of commercial grain producers on Kangaroo Island. However, producers are also mindful that there may be significant developments in GM technology

1

http://grainproducerssa.com.au/uploads/media/190308_GPSA_Submission_in_response_to_Anderson_Review_FINAL.pdf

which may be of commercial benefit to the Island's livestock or cropping industries in the future. These include potential GM ryegrass or drought tolerant wheat varieties.

The consensus at the Forum was that section 4 of the *Genetically Modified Crops Management Regulations 2008* ought to be amended to limit the moratorium to Kangaroo Island only (as shown):

4—Designation of area in which cultivation of genetically modified food crops is prohibited

Pursuant to section 5(1)(a)(ii) of the Act, ~~the whole of the State~~ Kangaroo Island is designated as an area in which no genetically modified food crops may be cultivated.

For the avoidance of doubt, it was intended that the proposed amendment would only apply to the cultivation of GM food crops in the designated area of Kangaroo Island until 1 September 2025, thereby removing the application of this prohibition on the rest of the State prior to this date.

In practice, this amendment will prevent the commercial cultivation of genetically modified food crops on Kangaroo Island until 2025, unless the Act is otherwise repealed. The proposed change to Section 4 also allows KI producers and KI Pure Grain to implement segregation protocols should GM technology become available which may be of use to the Island's livestock or cropping industries prior to 2025.

GPSA recommends that further consultation with local primary producers occur well in advance of the expiry of the moratorium, and in the event new GM varieties approved by the OGTR become available. This prohibition should not remain indefinitely and instead be subject to regular review.

GPSA believes that this is a common-sense approach given the unique circumstances on Kangaroo Island and its geographic isolation. Primary producers present at the meeting, appear keen to embrace suitable GM technology when it becomes available, while enabling KI Pure Grain to continue to service its long-standing customer in the immediate term.

Finally, GPSA believes this amendment would facilitate grower choice in mainland South Australia, provide a commercial incentive to fund research in GM technology, and enable free movement of GM material approved by the OGTR, consistent with our existing policy position.

Please do not hesitate to contact me should you wish to discuss this matter further.

Yours sincerely



Caroline Rhodes
Chief Executive Officer
Grain Producers SA

Attachment: Agenda – Kangaroo Island Primary Producers Forum, 15 March 2019

CC: Primary Producers SA, Livestock SA, AgKI, PIRSA



Kangaroo Island Primary Producer Forum

South Australia's Moratorium on Genetically Modified Crops

2pm Friday 15th March 2019

Registration from 1.45 pm at Parndana Football Club

Primary Producers SA, Grain Producers SA, Livestock SA, and Agriculture Kangaroo Island will be holding a Primary Producer Forum to discuss the findings from the independent review of South Australia's GM crop moratorium

See the full report here: www.tinyurl.com/PIRSAreview

Have your say on this important issue to KI grain and livestock producers.

Agenda

Time	Item	Presenter
2:00pm	Open and welcome	
2:05pm	The Independent GM Review – The process so far and a summary of the findings	<ul style="list-style-type: none">• Caroline Rhodes, Grain Producers SA CEO
2:20pm	Primary Producers SA – industry position on GM	<ul style="list-style-type: none">• Jamie Heinrich, Livestock SA Director• Adrian McCabe, Grain Producers SA Deputy Chairman
2:30pm	How the findings affect Kangaroo Island and the options going forward.	<ul style="list-style-type: none">• Rick Morris, AgKI Chairman
2:45pm	Open forum – Have your say	
4:00pm	Close	

RSVP for catering purposes : info@grainproducerssa.com.au

For further information phone GPSA 1300 734 884