Australian Seed Federation
SOWING SEEDS

ABN 66 003 160 638

20 May 2025

Hon Jane Howlett MP
Minister for Primary Industries and Water
Minister for Hospitality and Small Business
Minister for Racing

GPO Box 123
HOBART TAS 7001

Submitted via email: gmo@nre.tas.gov.au

Dear Minister,

RE: 2025 Tasmanian GMO Environmental Scan

Please find attached the Australian Seed Federation's submission in response to the 2025 Tasmanian GMO Environmental Scan.

As the peak body representing Australia's seed industry, ASF welcomes the opportunity to contribute to this important review and supports continued engagement with industry to ensure Tasmania's regulatory settings are aligned with contemporary science, market realities, and grower needs.

We would be pleased to provide any further information or clarification as required.

Yours sincerely,

Katherine Delbridge
Chief Executive Officer
Australian Seed Federation

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Tasmanian GMO Environmental Scan (May 2025)

The Australian Seed Federation (ASF) welcomes the opportunity to comment on the 2025 GMO Environmental Scan and appreciates the Department's ongoing consultation with industry on this matter.

ASF is the peak body representing the Australian seed industry, including conventional, organic, and genetically modified (GM) seed stakeholders. Our membership spans the full diversity of cropping systems and markets, and we are committed to supporting science-based, practical policy settings that deliver value and choice to Australian growers and markets.

1. Regulatory alignment for SDN-1

ASF reaffirms its support for Tasmania aligning its regulation of site-directed nuclease-1 (SDN-1) organisms with the rest of Australia under the National Gene Technology Scheme (NGTS). Under Commonwealth regulation, SDN-1 organisms are not considered genetically modified organisms (GMOs), and are exempted from regulation under the National Gene Technology Scheme.

Tasmania's continued classification of SDN-1 organisms as GMOs by way of an arbitrary exclusion from import permits under biosecurity provisions, creates a misalignment that places Tasmanian farmers at a disadvantage compared to their mainland counterparts. This restricts access to emerging varieties developed through genome editing techniques that are widely permitted in other leading agricultural nations.

2. Lack of market evidence for the moratorium

ASF notes that the Environmental Scan does not present any data or market analysis to demonstrate a quantifiable premium for Tasmania's GMO-free status in export markets. In fact, the moratorium has cost the state's agricultural sector an estimated $4 million each year[1], with little tangible benefit in return. Instead, the report leans heavily on anecdotal views from a narrow range of stakeholders.

Importantly, the Scan confirms that major export destinations, including Japan, the US, China, and South Korea, already import agricultural goods from jurisdictions that allow the cultivation of GM and genome edited products. The Scan also found no Tasmanian company actively using the State's GMO moratorium as a marketing claim in these markets.

[1] 1 Macquarie Franklin 2012, Market advantage of Tasmania's GMO-free Status, Devonport, Tasmania

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This reinforces ASF's view that the claimed market benefits of Tasmania's moratorium remain speculative. Without robust evidence of price premiums or market access risks, the moratorium's opportunity cost — in lost access to innovation — should be more rigorously assessed.

3. Impact on innovation and grower competitiveness

Tasmanian growers face mounting challenges from climate variability, pest and disease pressure, and rising costs. ASF members continue to invest in safe, modern breeding technologies — including conventional, GM and genome edited techniques — to deliver productivity, resilience, and sustainability benefits across a range of crops.

By maintaining a misalignment with the National Gene Technology Scheme, the Tasmanian Government is denying its growers access to innovations available elsewhere in Australia and internationally. This not only limits farm-level productivity, but also deters R&D investment and undermines Tasmania's long-term agricultural competitiveness.

4. Coexistence and market choice

ASF acknowledges that segments of Tasmanian agriculture — particularly organic and niche premium producers — may prefer to avoid GM technologies. However, this does not require a blanket moratorium, nor a workaround solution to deny access to SDN-1 organisms.

Coexistence between different production systems has been successfully achieved through established stewardship practices and segregation protocols. Across mainland Australia and globally, coexistence frameworks enable growers to maintain product integrity and choose technologies suited to their markets without regulatory overreach or unnecessary barriers to innovation.

ASF recommends supporting innovation in Tasmania's primary production sector by allowing farmers the choice to access the technologies best suited to their agricultural production systems. A more flexible, science-based approach will help position Tasmania for long-term competitiveness without compromising market diversity or integrity.

5. Recommendations

ASF recommends the Tasmanian Government:

1. Amend the Tasmanian Biosecurity Act 2019 to align with national treatment of SDN-1 organisms, exempting them from regulation as GMOs;
2. Commits to evidence-based policymaking by conducting economic and market analysis when next reviewing the GMO moratorium;

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3. Continue its engagement with industry in future regulatory reviews to ensure policy settings reflect contemporary science and support a competitive seed and agricultural sector;
4. Support innovation in the Tasmanian primary production sector by allowing Tasmanian farmers the choice to access the technologies best suited to their agricultural production system.