

20 May 2025

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

By email: Minister.Howlett@dpac.tas.gov.au

Dear Minister Howlett

Thank you for your letter dated 10 April 2025 and for sharing the latest Genetically Modified Organisms (GMO) Environmental Scan Report (the Report) by the Department of Natural Resources and Environment Tasmania. The University of Tasmania appreciates the opportunity to provide feedback on the findings of the Report particularly the regulation of SDN-1 modified organisms in Tasmania. We commend the Department for its thorough review of consumer sentiment, market developments, and advances in gene technology, and for its proactive engagement with stakeholders.

The University of Tasmania acknowledges the importance of maintaining the GMO moratorium to preserve the identity of Tasmania's GM-free agricultural products, which continues to offer significant marketing benefits for our premium, Tasmanian-branded produce. While the GMO moratorium delivers branding benefits, the University recognises the growing acceptance of innovative gene editing techniques like SDN-1 in key markets. These techniques, which do not introduce foreign DNA, have the potential to drive agricultural and commercial advancements.

We strongly advocate for better alignment of Tasmania's gene technology regulations with national standards as this would enable researcher scientists and industry to operate without unnecessary regulatory obstacles, fostering innovation and supporting the development of Tasmanian products more efficiently and opening new industry and commercial opportunities.

As the primary tertiary education provider in Tasmania, the University of Tasmania plays a crucial role in the current and future development of many Tasmanian industries and innovations. Gene technology has been central to global agricultural advancements for several decades, and the University is committed to training the next generation of innovators. To remain competitive in the global research and development landscape, our students, research scientists and industry partners must have access to leading-edge technology. Our University Physical Containment facilities are certified compliant and audited by the Office of the Gene Technology Regulator (OGTR), ensuring that the potential risk of GMO escape and harm to Tasmanian people, environments, and export markets is negligible.

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The University of Tasmania advocates for an open management approach for SDN-1 organisms, recommending full deregulation with no need for regulatory authority confirmation to conduct activities. This position is based on the clear market conditions and the scientific understanding that SDN-1 techniques do not introduce foreign DNA and result in changes that could occur naturally. The current arrangement, where Tasmania considers SDN-1 organisms differently from the OGTR, creates conflicting compliance obligations and regulations, confusion for researchers and industry. Deregulation will streamline research activities without substantially increasing risk.

In summary, the University of Tasmania strongly supports a regulatory approach that aligns with national standards to ensure Tasmania remains competitive in research and innovation. Streamlining regulations will not only enhance efficiency but also unlock new opportunities in agriculture.

We look forward to continuing to collaborate with the Tasmanian Government to balance market sensitivities with scientific and commercial advancements.

Yours sincerely



Professor Anthony Koutoulis
Deputy Vice-Chancellor (Research)

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