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Submission to the Office of the Gene Technology Regulator, Australia, concerning the 2016-17 Technical Review of the Gene Technology Regulations 2001

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Given that the New GM Techniques, as specified in the enclosed ENSSER statement,

- modify DNA, RNA or gene function regulation in an artificial (non-natural) manner;
- result not only in intended effects, but also in unintended and/or unpredictable off-target effects, as the scientific evidence shows;
- are in some cases easy and cheap to use, opening up the possibility of abuse and inadvertent misuse with an alarming likelihood,

all of these techniques should be at least as stringently regulated as the transgenic methods used in currently commercialized GMOs. Qualitatively improved, stricter regulatory standards may be needed for the genome editing techniques among them, due to their improved capacities for quantitative upscaling, miniaturisation and automation, as well as to potential abuse and misuse.

The enclosed ENSSER statement further explains these arguments and provides the scientific evidence underpinning them.

Encl.:

ENSSER statement "Products of new genetic modification techniques should be strictly regulated as GMOs" d.d. 27 September 2017