

Email Submission: Christine Glen

With regard to the proposed amendments to Gene Technology Regulations, 2001, I would like to make the following submission:

1. The new gene technologies such as CRISPR et al. are just that: new. And these technologies must be regarded as “new” for a long time so that they can be subjected to long-term safety assessments by independent researchers. They must be studied over a very long period to prove that they are not harmful.
2. The new gene technology techniques involve risks such as, inter alia, producing unintended (or intended) results such as mutations which can be harmful, and the efficacy of these techniques can make it very difficult to identify such genetic modification once outside the laboratory.
3. Such genetic modifications can be passed between organisms and species, and within species. They should be regarded as irrevocable.
4. If genetic modifications are not labelled as GM and cannot necessarily or easily be identified independently, any harmful effects arising from those genetic modifications cannot easily be ascertained.
5. Any organism whose genes have been changed in any way has been genetically modified. Obviously.
6. Any organism which has been genetically modified should be labelled as such in perpetuity.

I submit that any modification of the regulations which allows the elimination or omission of GM labelling should not be countenanced.

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