Consultation questions

1. Which option/s do you support, and why?

   Of the 4 options presented, the Royal Perth Hospital IBC supports Option 4. The Committee considers it preferable to exclude specific techniques or organisms from regulation rather than provide potentially ambiguous exclusions. Having said that, the Committee would prefer that the exclusions be based on the outcomes created rather than specific techniques or organisms used, i.e. outcomes which could not occur naturally within a species should be regulated regardless of the technique used to create them.

2. Are there other risks and benefits of each option that are not identified in this document? It would be possible through the repeated application of an excluded technique to create a high-risk GMO which would be exempt from regulation.

3. Is there any scientific evidence that any of options 2-4 would result in a level of regulation not commensurate with risks posed by gene technology? See response to question 2. Conversely, outcomes which could potentially occur naturally within a species could end up regulated due to the technique used to create them.

4. How might options 2-4 change the regulatory burden on you from the gene technology regulatory scheme? Minimal to no change; our Committee has regulatory oversight of primarily exempt dealings.

5. How do you use item 1 of Schedule 1, and would it impact you if this item was changed? Depends upon the change.

6. Might contained laboratory research on GM gene drive organisms pose different risks to other contained research with GMOs, and how could these risks be managed? Yes. Regulate based on outcome. Supporting information and science-based arguments should be provided where possible.

7. What RNA interference techniques are you using, and are there RNA interference techniques that you believe have unclear regulatory status? Please provide details of the techniques and science-based arguments for whether these techniques pose risks to human health or the environment. No comment

8. Do you have proposals for amendments to any other technical or scientific aspects of the GT Regulations? All proposals should be supported by a rationale and a science-based argument. Not at this time.