

## Email Submission: Mube Nalbant

### The Regulations Review, The Office of the Gene Technology Regulator (MDP 54);

Dear Sir/Madam,

In response to your call for submissions on the proposed amendments to the Gene Technology Regulations 2001, **I strongly oppose the proposed amendments** contained in the first “key proposal” listed (i.e. the amendment of the GMO classifications) for the following reasons:

- 1) Any organisms produced using any type of gene editing technologies like CRISPR are GMOs from a medical perspective and must be clearly labelled so. If organisms modified using site-directed nucleases (with or without a template) are in our food, we have a right to know. I feel that if this proposal is enacted it will be the equivalent of “gerrymandering” scientific definitions.
- 2) The submissions prove no public case for the changing of this definition, and so we can only “hope” this definitional change will be in public interests. If changes as significant as these are to pass, their longer-term impact should be at the fore-front of public discussion.
- 3) From my understanding the use of certain templates will normalise certain genetic modification procedures. Whilst I am not fundamentally against genetic modifications and research, and certainly don't wish to slow down scientific progress with unnecessary bureaucracy, this proposal goes too far for the time being, especially given our current (lack of) knowledge regarding the impact of GMO on our societal and natural ecosystems.

Genes are not independent entities, they carry a part of an algorithm in a context. We do not yet know the effects of multiple sequential editing on modified living systems regardless of the ‘current classification of the modification’. This change could seriously endanger future generations and ecosystems without justified public benefit in the short-term (see points 1) and 2) above).

Instead of changing the definition of subgroups of GMOs, we should work towards ensuring that current and subsequent modifications are documented and evaluated in a transparent manner.

I believe SDN-1,2 or 3 changes must be labelled and continuously monitored in order to improve safety systems. If we, as a country spend millions of dollars to find out what our definition of marriage is (which isn't to say it wasn't a worthy question), we should also be able and willing to properly engage in a wider public discussion about what it means for goods, plants and animals we consume and live with to be “genetically modified”.

Thank you for the opportunity.

Kind regards.