

**Email Submission: The Organic Industry Standards and Certification Council**

OISCC as the peak council of the organic industry in Australia pertaining to issues of standards, accreditation, certification and market access, notes the following relating to the proposed changes by the OGTR in reclassifying certain classes of GMOs.

OISCC harbours the entire certified organic industry via its membership. This industry relies on access to markets based upon a clear non GMO offering of its certified organic products arising from Australia.

This is clearly enshrined in law via the National Standard, which in turn delivers market access, and market premiums, for Australian producers and exporters.

The proposed reclassifications, being out of step with some of our major trading partners definitions, runs the risk of the loss of those markets for Australian producers.

We therefore caution against this set of proposals out of concern for the market impact and damage it potentially may have.

**Kind Regards**

**Marg Will**

**Secretariat**

**The Organic Industry Standards and Certification Council Inc.**