

## 9.5 GM Crops

Report contact	Meeting
Ynys Onsman, Manager Strategic Futures (acting)	Council
Approving officer	Date
Scott Ashby, Chief Executive Officer	15 September 2020

### 1. Purpose

To provide elected members with a draft application to the Minister for Primary Industries and Regional Development, David Basham (the Minister), for the City of Onkaparinga to be designated a non-GM crop area, along with the supporting evidence relevant to trade and marketing matters in our city.

### 2. Recommendations

That Council endorse the draft application **and letter to Minister Basham, attachment 1 to this agenda report**, for his consideration, providing the CEO with authority to make further amendments to the application ensuring the intent remains the same.

### 3. Executive summary

The City of Onkaparinga has prepared a draft application asking the Minister to designate our City as a non-GM crop area (attachment 1). This application follows community engagement which indicated a clear preference from our key stakeholders (including primary producers and food manufacturers), along with the general community, for this designation. The application draws on the community engagement results, submissions from peak bodies such as the McLaren Vale Wine Grape Tourism Association, and further research to make the case that on the balance, relevant businesses (particularly Certified Organic/Biodynamic vineyards and wineries) in our City stand to lose more than they would gain from the impact of GM crops on the actual and potential export value of their product (attachment 2). The primary evidence provided by four wineries in McLaren Vale shows \$5.1 million per annum of export value is at immediate risk. Modelling indicates this could be at least \$20.8 million per annum.

## 4. Background

<p>Community Plan 2030</p>	<p><b>prosperity:</b> economically strong, environmentally thriving</p> <p>Making an application to be designated a non-GM crop area would, if <b>successful, contribute to achieving the outcome: 'We support local job growth, investment and industry development.'</b></p> <p>A secondary impact of a successful applications would be its contribution to the outcome: 'We champion our environment, reinforcing its strengths, regenerating its losses and protecting its vulnerabilities.'</p>
<p>Policy and/or relevant legislation</p>	<p><i>Genetically Modified Crops Management Act 2004 (GMCM Act)</i></p>
<p>Who did we talk to/who will we be talking to</p>	<p>Primary producers, food manufacturers, and representative bodies Business and Tourism Associations General communities</p>

## 5. Discussion

Councils have a once-off opportunity to apply to the Minister asking him to designate their City a non-GM crop area. This application must be made by 30 September 2020, to allow enough time for him to consider the evidence, consult with the GM Crop Advisory Committee (a committee established under the *Genetically Modified Crops Management Act*) and seek any other advice or information before making his decision.

**Councils must 'consult with its community, including persons engaged in primary production activities and food processing or manufacturing activities in the area of the council' before applying to the Minister for designation.**

At its meeting on 16 June 2020, Council resolved to undertake community engagement to understand sentiment and seek evidence to help inform elected members about whether, on the balance, the introduction of GM crops would create a financial loss or gain for businesses within our City with respect to trade and marketing.

The community engagement was open from 22/06 – 14/07 (5 weeks), and targeted the following groups:

- Key stakeholders: primary producers, organisations representing primary producers, food processors and manufactures, and retail businesses selling products made from crops/perishables
- Secondary stakeholders: Business and Tourism Associations
- General community: including special interest groups, residents and others.

The engagement evaluation at attachment 3 details the engagement techniques, response rates and outcomes of the engagement approach. The 314 valid survey responses and 46 submissions **received during the engagement period were analysed by Mint Research. Mint's full report can be found at attachment 4.**

Key findings included:

Question	Key stakeholders	General community
Should CoO apply to the Minister to be designated a GM crop free area?	70% yes 30% no	80% Yes 20% no
If YES, were trade and marketing reasons cited?	73% yes 27% no	42 % yes 58% no
Main reasons primary producers cited as reasons to apply (responses #50): Detrimental to brand/reputation/point of different - 49% High risk of contamination/jeopardy of certification/crop loss - 7%		
Main reasons primary producers cited as reasons NOT to apply (responses #21): Crops resistant to drought/disease - 24% Economic benefit/longer term business viability - 19%		

These results, along with presentations from the Grain Producers of South Australia (GPSA), National Association for Sustainable Agriculture, Australia (NASAA) and the McLaren Vale Wine Grape and Tourism Association (MVWGTA) were presented at an elected member session on 25 August 2020. Notes from this session are at attachment 5.

On the basis of this evidence, elected members requested a draft application to the Minister be presented to Council on 15 September for consideration. Elected members asked that further evidence validating the potential economic impact of the introduction of GM crops in our City be sought and considered when drafting this application.

Subsequent information was received from:

- GPSA, which emailed this information directly to elected members and the CEO, cc-ing Minister Basham.
- NASAA, which provided a 2016 report on Organic Farming by IBISWorld
- MVWGTA, which provided additional information including trade testimonies from several of its member wineries.

The draft letter and application at attachment 1 draws on the evidence provided by presenters, the community engagement and research to present the rationale for why, on the balance, the **City of Onkaparinga's primary producers and associated industries stand to lose more than they will gain from the GM moratorium being lifted.**

The key evidence and modelling included in the application is:

- We have received 15 trade testimonials via four of our Certified Organic/Biodynamic wineries from importers across the globe, stating their concerns that introducing GM to the region would impact on their capacity to import wine from McLaren Vale. One trade testimonial, from wine trade company FORT in Russia, states that:  
***If...the use of GMO is allowed in McLaren Vale, then import to Russia will be impossible and our clients will no longer be able to enjoy the exquisite d'Arenberg wines...[and this would cost d'Arenberg] 250-300k annually.***
- Based on the export \$ value provided by these wineries alone, \$5.1 million per annum is at **risk of being lost on the basis of compromising McLaren Vale's assumed GM free status.** We

will continue to work with industry to ascertain the broader impact on the industry. Note: no GM crops have been grown in our City as yet, however lifting the moratorium now makes this possible.

- Based on the crush<sup>1</sup> \$ value of wine grape crops in McLaren Vale with Certified Organic/Biodynamic status (37 per cent - the highest proportion in Australia), the potential **loss is up to \$20.8 million per annum. While it can't be accurately modelled, this could be** much higher across total value to local and export markets, which is estimated to be in the hundreds of millions each year.
- This is in comparison to \$2.6 million per annum **for our city's broadacre cropping**, representing 1.5 per cent **of our city's total** agricultural exports, and \$3.03 million at risk in the importer contract that formed the basis for exempting Kangaroo Island from the removal of the GM moratorium across the rest of the state.

The draft application provides these points, along with:

- evidence of the importance of wine grape growing and wine production in our region, compared proportionally to broadacre cropping (wheat and canola)
- **McLaren Vale's international reputation as 'clean and green'**, and its unique characteristics as a wine region in South Australia
- implications of jeopardising Certified Organic and Biodynamic certifications, in which 37 per cent of area under vine in the McLaren Vale region have invested.

We believe that, within the timeframes allowed and evidence provided, the draft application **represents a strong case for the Minister's consideration.**

## 6. Financial implications

**Making an application to the Minister will have no financial implications.**

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<sup>1</sup> The total crushed is the total tonnes of grapes crushed from a particular source region, whether processed in that region, another region in SA or interstate.

## 7. Risk and opportunity management

Risk	
Identify	Mitigation
Many of our community members and business have strong opinions both for and against designating our City as a non-GM crop area	Clear messaging and a respectful, impartial approach have been adopted throughout the community engagement and subsequent reports. Those who have taken the time to provide their feedback through our engagement have had their responses considered in the engagement analysis. We will also notify those who engaged via Your Say about progress and outcomes.
There is misconception amongst some community members that Council is responsible for deciding whether or not our City is designated as a non-GM crop area	All engagement material has clearly stated that the decision will be made by Minister Basham, and that it will only be informed by evidence of trade and marketing impact - other issues are irrelevant to this consideration. However, to <b>ensure our community's feedback on other issues is heard</b> , we will write to the federal Office of the Gene Technology Regulator to inform them of the results from our community engagement analysis relevant to their jurisdiction.
Our engagement and research suggests that up to \$30.1 million in export contracts could be at risk as a result of GM crops being grown in our City	All relevant evidence of this potential loss will be provided to the Minister for consideration, as part of the application (pending Council endorsement).

Opportunity	
Identify	Maximising the opportunity
Making an application to the Minister provides the opportunity to advocate on an important economic issue for our City.	Ensure the application is based on sound evidence and rationale, demonstrating the benefits designating our City as a non-GM crop area will have to both our producers, and the state.

## 8. Timelines and deadlines

If Council endorses the application, it must be provided to the Minister by 30 September 2020. This will allow him enough time to consider the evidence, seek clarification and consult with the GM Crop Advisory Committee before making his decision. If that decision is to make a designation, it must be gazetted (turned into law) by November 2020.

## 9. Next steps

If approved, the letter and application will be sent to the Minister and engagement participants notified of outcomes.

## 10. Attachments

Attachment 1 – Draft letter and application to Minister Basham (8 pages)

Attachment 2 – Submission from MVGWTA with evidence from wineries (21 pages)

Attachment 3 - Community Engagement Feedback Report (10 pages)

Attachment 4 – Engagement Summary Report and Analysis - Mint Research (44 pages)

Attachment 5 – EM session on GM Crop community engagement results (3 pages)

- END OF REPORT -

From the office of the Mayor  
City of Onkaparinga

September 2020

The Hon David Basham  
Minister for Primary Industries and Regional Development  
Member for Finnis  
GPO Box 1671  
ADELAIDE SA 5001

Dear Minister

Congratulations on your recent appointment as Minister for Primary Industries and Regional Development. As a fellow representative of South Australians living on the Fleurieu Peninsula I look forward to collaborating with you.

I write to formally apply to you to designate the City of Onkaparinga as a non-GM crop area, on the basis this would mitigate the risk of our region losing **at least \$5.1 million per annum in export value, and potentially up to \$20.1 million per annum in crop value**, should GM crops be grown in our world-renown McLaren Vale region.

As directed by the legislation, we have undertaken a broad and comprehensive community engagement to understand our businesses' and residents' views on the impact of GM crops, in relation to trade and marketing matters. This included:

- A survey which was open from 22/06 – 14/07 (5 weeks), targeting primary producers, organisations representing primary producers, food processors and manufactures, and retail businesses selling products made from crops/perishables, along with the general community.
- Presentations from the Grain Producers of South Australia (GPSA), National Association for Sustainable Agriculture, Australia (NASAA) and the McLaren Vale Wine Grape and Tourism Association (MVGWTA).
- Further submissions (received up until the date of this letter), including evidence validating the potential economic impact of the introduction of GM crops in our City.

This engagement demonstrates the majority of our businesses and residents believe making an application is the right thing for our region. In particular, many of our primary producers and food manufacturers expressed concern that GM crops in our City would likely have a negative impact on their current and future export potential.

Of particular focus is McLaren Vale, where the pre-eminent industries are grape growing, wine making and tourism. McLaren Vale is one of the most famous and marketable wine regions in the world, with a strong market focus on being clean, green and sustainable. The evidence in the attached submission demonstrates how our wine growers and producers believe their well-established brands could be jeopardised by the introduction of GM crops into the region.



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Your government's approach to lifting the state-wide moratorium allows for the reality that different regions of the state may require different approaches. Those areas that can benefit from the technology should, but we argue that our region has more to lose, and we support your government in saying that one size does not fit all, as you have already demonstrated on Kangaroo Island.

I recognise that you have difficult choices to make in relation to this matter. I would be pleased to meet with you in person to explain how we approached our engagement process and how we reached the position we have. Please have your office contact Wendy Goulding in my office on 8384 0118 if you would like to meet.

Yours sincerely

Erin Thompson  
Mayor

DRAFT

## Application to designate the City of Onkaparinga as GM crop free.

The City of Onkaparinga is uniquely positioned as a local government area which, if designated a non-GM crop area, could continue to produce and export world leading products which contribute substantial economic value not just to the region, but to the entire state.

The City of Onkaparinga recognises access to GM technology is supported by broadacre cropping primary producers in many parts of our state, particularly those who grow wheat and canola. We also understand that in future, GM technology for drought resistant wheat has the potential to greatly assist our water challenged farmers, and other useful applications may be developed.

However, our City is home to McLaren Vale, one of the most famous and marketable wine regions in the world. From the evidence provided by our wine growers and producers, wineries that contribute to this high value brand stand to incur a significant financial loss due to the introduction of GM crops in our state, unless we can protect its market reputation by being designated a non-GM crop area.

We believe designating the City of Onkaparinga as a non-GM crop area is an opportunity for the state government to make good use of the recognition provided by the *Genetically Modified Crops Management Act 2004* that different regions may require different approaches, due to the diversity in our primary production and food manufacturing, and the markets which import these goods.

Not only did our community engagement demonstrate a clear preference from our businesses and residents for the City to make the application, the majority of primary producers, food processors and manufacturers surveyed cited trade and marketing reasons for their position. See appendix 1 for full details of the engagement.

The key industry which risks economic loss from the moratorium being lifted is wine grape growers and producers within the Geographical Indication (GI)<sup>1</sup> of McLaren Vale, the boundaries of which closely align with the City of Onkaparinga (see figure 1). The overwhelming majority of members surveyed by McLaren Vale Grape Wine & Tourism Association, (MVGWTA) were in support of making an application to be designated GM free.

Representatives from leading wineries McLaren Vale provided clear evidence that some export markets for their wines would be put at risk if GM crops were grown in our City. Based on the McLaren Vale GI crush value<sup>2</sup> for 2020 (which is just one component that makes up the hundreds of millions of dollars in total value), **the estimated potential loss is up to \$20.8 million per annum<sup>3</sup>**. Evidence provided by just four prominent wineries shows an immediate risk to **\$5.1 million per annum<sup>4</sup>** in existing import markets.<sup>5</sup> This evidence is available at appendix 2.

In comparison, the KI Pure Grain contract value cited in its application to Professor Kym Anderson's *Independent Review of the South Australian Food Crop Moratorium* is \$3,025,000 p/a<sup>6</sup>. This contract

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<sup>1</sup> GI of McLaren Vale was entered in the Register of Protected Names on 2 September 1997

<sup>2</sup> 'Crush' is the total crushed is the total tonnes of grapes crushed from a particular source region, whether processed in that region, another region in SA or interstate.

<sup>3</sup> Based on the total 'crush' value for McLaren Vale GI for 2020 (\$56.7million) divided by 37% as the Area under vine that is Certified Organic/Biodynamic

<sup>4</sup> Based on export \$ values and trade testimonies provided to MVGWTA, as per attachment 1

<sup>5</sup> Figures supplied were based on total exports for non-COVID affected years

<sup>6</sup>

[https://pir.sa.gov.au/\\_data/assets/pdf\\_file/0006/339225/Independent\\_Review\\_of\\_the\\_South\\_Australian\\_GM\\_Food\\_Crop\\_Moratorium.pdf](https://pir.sa.gov.au/_data/assets/pdf_file/0006/339225/Independent_Review_of_the_South_Australian_GM_Food_Crop_Moratorium.pdf)

was enough evidence that, on the balance, Kangaroo Island producers stood to lose more from allowing GM crops than they did to gain from it. Subsequently, the state government decided to retain the GM moratorium on Kangaroo Island.

As our region could lose much more, we believe strong consideration should be given to the reasons why GM crop free designation is appropriate for our City, based on the following:

1. The unique agricultural landscape of our City
2. Strong international reputation of the McLaren Vale brand as 'clean and green' and 'sustainable'
3. High proportion of Certified Organic/Biodynamic (CO/BD) 'area under vine' in McLaren Vale
4. Evidence of risk to established export markets for the above vineyards, should GM crops be grown in the area.

#### 1. The unique agricultural landscape of our City

The City of Onkaparinga is a mix of urban and agricultural areas, with 65% of our 518 square kilometres used for primary production purposes. Our urban areas account for 11.6%<sup>7</sup>. Figure 2 shows our City's infrastructure in further detail.

Wine grape growing, the majority which are grown in the highly prized terroir of McLaren Vale and surrounds, accounts for 35.7% of businesses in the Agricultural, Forestry and Fishing industry<sup>8</sup>. Figure three shows the breadth of vineyards across our city. This is followed by livestock farming (16.1%), and fruit, nut and vegetable growing (3.2%).

And it's not just growing the grapes. In 2018-19, beverage manufacturing contributed the most to the region's total exports (\$445.9M; 23%)<sup>9</sup>. This accounts for 15% of the state's total exports of beverage products.

According to the ABS, in 2018-19 wine grape crops from our City had an approximate value of \$22.8 million per year. The broadacre cropping has an estimated value of \$2.6 million per year. In contrast, broadacre cropping accounts for just 1.5% of our City's primary production<sup>10</sup>. Of this, the two crops with the potential to access current GM technology, wheat and canola, account for 0.23% and 0.0%.

We believe the relative value of the wine industry compared to broadacre cropping in our region is sound evidence that the trade and marketing implications of GM crops should be firmly focused on the wine industry.

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<sup>7</sup> Source: [Economy ID](#). Note 'urban' includes a combination of the following categories: residential, industrial, commercial, education and hospital/medical

<sup>8</sup> Based on SA4 ABS data (Onkaparinga, Mitcham, Holdfast Bay, Marion. The other three council areas produce minimal, if any, grapes). Australian Bureau of Statistics. (2020). Agricultural commodities, state and SA4 region–South Australia–2018-19 [Data cube]. Agricultural commodities, Australia–2018-19. Retrieved July 21, 2020.

<https://www.abs.gov.au/ausstats/abs@.nsf/mf/7121.0>

<sup>9</sup> National Institute of Economic and Industry Research (NIEIR)©2019. Compiled and presented in economy.id by.id the population experts. Data are based on a 2016-17 price base for all years. NIEIR-ID data are inflation adjusted each year to allow direct comparison, and annual data releases adjust previous years' figures to a new base year

<https://economy.id.com.au/onkaparinga/exports-by-industry?IndkeyNieir=23001&sEndYear=2018>

<sup>10</sup> Based on SA4 ABS data (Onkaparinga, Mitcham, holdfast bay, Marion. The other three council areas produce minimal grape or broadacre crops). Australian Bureau of Statistics. (2020). Value of agricultural commodities produced, State and SA4 regions- South Australia–2018-19 [Data cube]. Value of Agricultural Commodities Produced, Australia, 2018-19.

Retrieved August 27, 2020. <https://www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/7503.02018-19?OpenDocument>

It is important to note that the GI for McLaren Vale stretches across the vast majority of the agricultural sections of our City, with vineyards from Sellicks to Kangarilla<sup>11</sup>. The GI of McLaren Vale is protected under Australian law, and wines which use false or misleading presentations or descriptions to claim they originated in this region can lead to fines and imprisonment.<sup>12</sup>

## 2. Strong international reputation of the McLaren Vale brand as 'clean and green', and 'sustainable'.

McLaren Vale has a strong reputation as a leading example of sustainable viticultural practices, and access to GM crops provides no immediate benefit to this industry.

The region is a world leader in sustainable grape growing, a position that has taken many years and significant resources to achieve. The Sustainable Australia Winegrowing (SAW) program developed by the McLaren Vale Grape Wine and Tourism Association (MVGWTA) began in the early 2000's, with the objectives to improve viticultural practices, fruit quality and financial viability in the region. The McLaren Vale SAW program has been so successful it was transitioned to national industry partners, the Australian Wine Research Institute and Wine Australia in mid-2019, and now forms a part of the foundations for the single national sustainability program for wine growers and producers in Australia.

This investment in environmentally leading methods of production not only to improve sustainable outcomes now and into the future, but ensure these wineries are best placed to capture the high-end customers who prefer 'clean and green' products. For example, mainland China is McLaren Vale's largest export market by value<sup>13</sup>. Consumer research indicates that Chinese buyers associate 'green/organic certification' with 'healthy foods'<sup>14</sup>. While China hasn't banned the importation of GM food or beverages, it makes good sense to ensure McLaren Vale's premium wine offerings remain free of any potential barriers for this market.

The region's wine production is also unique in the South Australian market. MVGWTA, which is our region's peak body representing over 550+ members, highlights that the Geographical Indication (GI) area of McLaren Vale is one of Australia's highest value wine grape production and wine export regions, consistently over indexing the national averages for prices achieved per tonne of grapes grown, and prices achieved per litre of wine exported (Freight On Board)<sup>15</sup>.

McLaren Vale is close in quality and reputation to Tasmania (which is similarly one of Australia's highest wine grape production and wine export regions)<sup>16</sup>. While Professor Anderson's review found little evidence of risk to export potential in SA, the report<sup>17</sup> which informed the Tasmanian Government's decision to retain its moratorium found that in effect, Tasmanian businesses enjoy the marketing benefits of assumed GM free status, by virtue of their provenance. It states:

'...although GMO-free status was not a major [current] marketing focus...businesses interviewed that currently import Tasmanian products place a high value on non-GM

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<sup>11</sup> <https://www.wineaustralia.com/labelling/geographical-indicators/labelling-gi-mclaren-vale>

<sup>12</sup> <https://www.wineaustralia.com/labelling/register-of-protected-gis-and-other-terms>

<sup>13</sup> Wine Australia; Export Report March 2020 – Australia; page 6.

<sup>14</sup> <https://www.nielsen.com/us/en/insights/report/2018/unpacking-the-sustainability-landscape/>

<sup>15</sup> <https://www.wineaustralia.com/market-insights/regional-snapshots>

<sup>16</sup> <https://www.wineaustralia.com/market-insights/regional-snapshots>

<sup>17</sup> <https://dpiwwe.tas.gov.au/Documents/GMO%20Final%20Report.pdf>

food and indicated that they would be unwilling to import GM food, with some expressing the belief that lifting the moratorium would negatively impact the Tasmanian Brand or harm their business financially’<sup>18</sup>

This is a similar situation to the McLaren Vale region, with clear evidence that some importers would cease to purchase our produce should that assumed status be lost, as outlined in point 4.

The Tasmanian report also states:

‘the benefits of ending the moratorium would [only] accrue to GM producers, suppliers of GMOs and related agricultural inputs, and businesses utilising GM products.’

Given the vast majority of our primary produce is wine grapes, the benefits of ending the moratorium will similarly accrue to a very small number of producers, at the potential cost to many others.

### 3. High proportion of Certified Organic/Biodynamic (CO/BD) vineyards in McLaren Vale

The primary risk of introducing GM crops to our region is jeopardising the export potential of CO/BD wines. Currently, 37% of the vineyards in the McLaren Vale region are CO/BD, compared to 4% nationally. Our closest comparable wine region, the Barossa Valley, has less than 5% of vineyards with this status.

Creating and maintaining the conditions that allow such certifications requires substantial investment from the wineries, and results in product that importers are willing to pay a premium for. While it may be possible to grow GM crops alongside non-GM crops, it is arduous and costly to maintain their certification for small scale CO/BD producers. As the Agricultural Biotechnology Council states:

‘there are many levels of regulation to ensure that farmers do what is required to stop GM and non-GM crops from mixing.’<sup>19</sup>

Within the timeframes of this application, no evidence was found of large-scale GM crops being grown in close proximity to wine regions with high proportions of Certified Organic/Biodynamic vineyards. As such, there is little available evidence that the stringent certification requirements for Certified Organic/Biodynamic farms wouldn't be compromised, which is paramount to maintaining the value of this investment:

‘Organic and GMO-free production systems and markets for organic and GMO-free products have zero tolerance for GM contamination and any amount of contamination could risk the loss of those markets and any premium dependant on the organic or GMO-free attributes of the products’<sup>20</sup>

Even if there is an ‘allowable tolerance’ for contamination, different import markets have different requirements. This would add a level of complexity and cost to CO/BD producers that is disproportionate to the gains of allowing GM cropping in our region. As stated by MVGWTA:

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<sup>18</sup> <https://dpiwve.tas.gov.au/Documents/GMO%20Final%20Report.pdf>

<sup>19</sup> [http://www.pioneer.com/CMRoot/International/Australia\\_Intl/GMcrops.pdf](http://www.pioneer.com/CMRoot/International/Australia_Intl/GMcrops.pdf)

<sup>20</sup> <https://dpiwve.tas.gov.au/Documents/GMO%20Final%20Report.pdf>

'The presence of GM food crops in McLaren Vale would add significant complexity (and cost) to the traceability and labelling requirements that are necessary for Certified Organic and Biodynamic wine businesses to maintain certification status, and therefore ability to secure market premiums, access and preference as a result. A GM Free designation removes the need for businesses to continuously demonstrate proof-of freedom from GM contamination – enabling GM crops to be grown would reverse the onus of proof so that businesses wishing to market GM Free product would need to establish systems and bear the cost of demonstrating the product's freedom from GM contamination.'

#### 4. Evidence of risk to established export markets for the above vineyards, should GM crops be grown in the area

Allowing GM crops not only adds minimal financial benefit to our region, it introduces a substantial risk to our existing and highly successful wine industry.

The overwhelming majority of members surveyed by the MVGWTA were in support of making an application to be designated a non-GM crop area. Those with CO/BD status perceived a high and costly risk to their export markets should their GM free status be compromised.

Submissions from d'Arrenberg, Paxton, Gemtree, and Yangarra wines, which have established markets in over 25 countries world-wide, shows overseas importers have deep concerns about GM material and rely on the McLaren Vale provenance as proof there is no potential for contamination.

The collective export value these wineries believe is at risk is **\$5,140,342 in international exports p.a.**, as evidenced by 15 importers providing trade testimonials or permission to add their names as supporting evidence that these trade deals could be at risk. These submissions are attached at appendix 2.

As an example, one trade testimonial from wine trade company FORT in Russia, states that:

'If...the use of GMO is allowed in McLaren Vale, then import to Russia will be impossible and our clients will no longer be able to enjoy the exquisite d'Arenberg wines [and this would cost d'Arenberg] 250-300k annually.'

Winery	Export \$ value (FY19)	Importers providing trade testimonials	Country
d'Arenberg Wines	1,194,207	Fort Wines & Spirit Vinetum Gusto World	Russia Finland Belgium
Paxton Wines	1,200,000	None	n/a
Gemtree Wines*	1,700,000	Wine Exchange Asia Tasty Brands Vinovia Wine Group Ward Wines Better Solution International Chengdu Sacred Tree WineToChina	Singapore Denmark US Sweden China China China
Yangarra Vineyard Estate Wines	1,046,135	Allied Young Hangzhou Tangyuan Vinovativa Boutino Fine Vintage Far East	Korea China Sweden UK Hong Kong
Total export value	5,140,342		

*\*trade \$ European market only. Permission given from importers to cite names, no supporting letters*

Further supporting evidence in support of non-GM crop designation was provided by:

- Angrove family wines, which is fully Certified Organic in all of its family owned vineyards (over 430 Ha). Angrove states that 'enabling GM crops to be grown in the McLaren Vale...region will adversely impact the region's brand equity and reputation and has the potential to have significant commercial impact on our business.'
- NASAA Certified Organic (NCO) states that 'NCO certifies 1,065 hectares of land in the Onkaparinga Region across a range of commodities, which equates to approximately \$3.4m in organic sales per annum, and encourages making the region a non-GM crop area 'to maintain current local and international markets, and provide opportunity to enhance these markets into the future.'
- Australian Organic Limited (AOL), the leading peak body for organics in Australia, highlights that GMO products and GE processes are prohibited in all aspects of organic production systems, and notes that '...the clean green image of Australia, coupled with the best farming practices and stringent traceability assurances that organic certification provides, put Australian organic produce in the highest regard in the eyes of customers around the globe'.

This represents an important sample of the scale and impact of potential loss should GM crops be introduced to our City. Given the large proportion of vines under CO/BD status, the total amount at risk is very likely to be much higher.<sup>21</sup> The risk to the 'crush' value alone is **up to \$20.8 million per annum**<sup>22</sup>, based on 2020 figures.

<sup>21</sup> Wine Australia's total FOB export value for McLaren Vale for the past 12 months to July 2020 was \$83m. Total value (including local and export sales) is estimated to be hundreds of millions each year.

<sup>22</sup> Based on the total 'crush' value for McLaren Vale GI for 2020 (\$56.7million) divided by 37% as the Area under vine that is Certified Organic/Biodynamic.

Given this evidence, and the factors outlined above, the City of Onkaparinga and South Australia stands to lose more than it would gain from an economic perspective, should primary producers be able to grow GM crops in our region. As such, we ask that consideration be given to our application to be designated a non-GM crop area, and would welcome the opportunity to provide more detail and/or opportunities to speak with our peak community groups such as MGVTA, should the Minister or his committee so wish.

DRAFT

Figure one: McLaren Vale Geographical Indication via Wine Australia  
 Note: green = vineyards

# MCLAREN VALE

South Australia

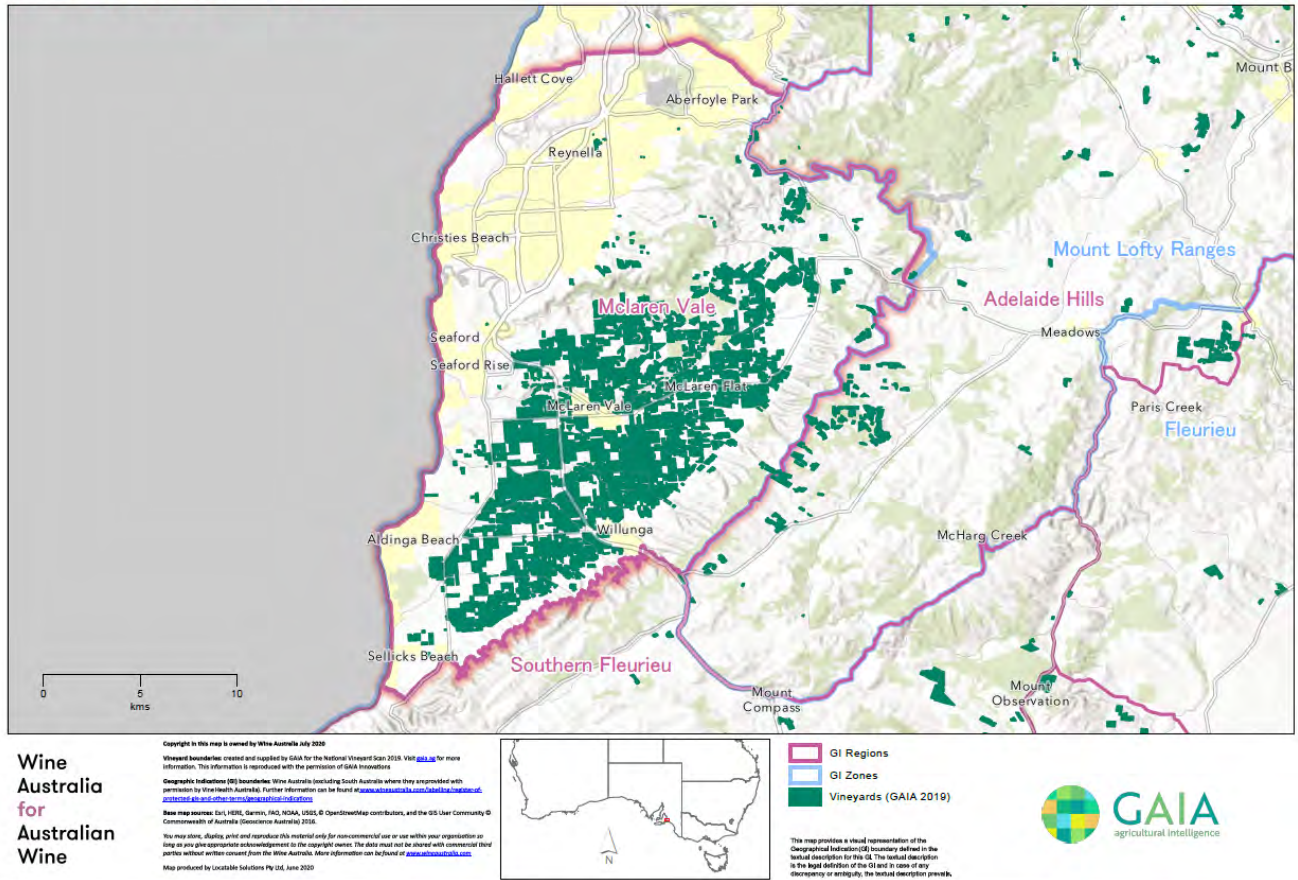


Figure 2: City of Onkaparinga Infrastructure via Economy ID  
 Note: yellow areas are primary production

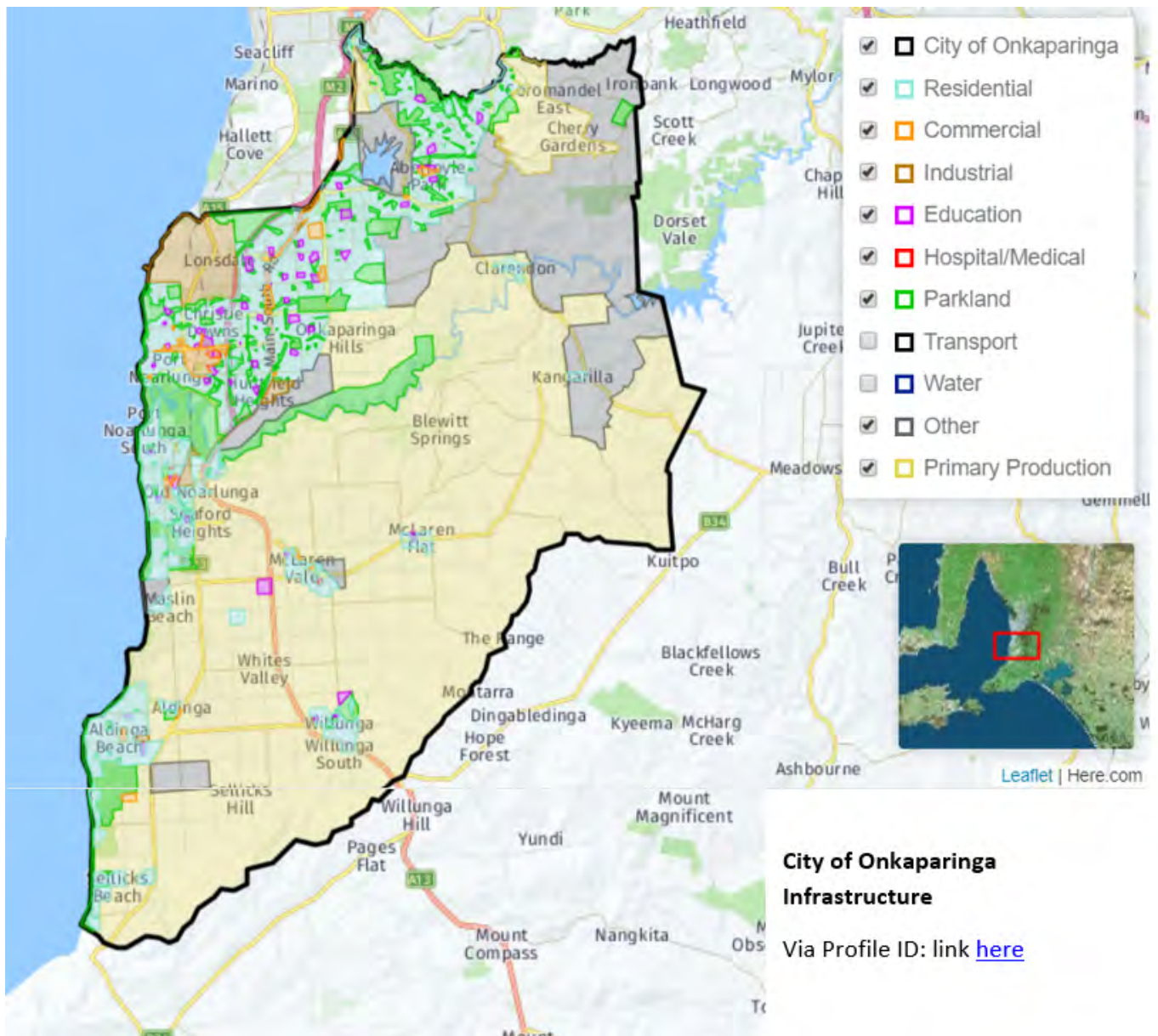
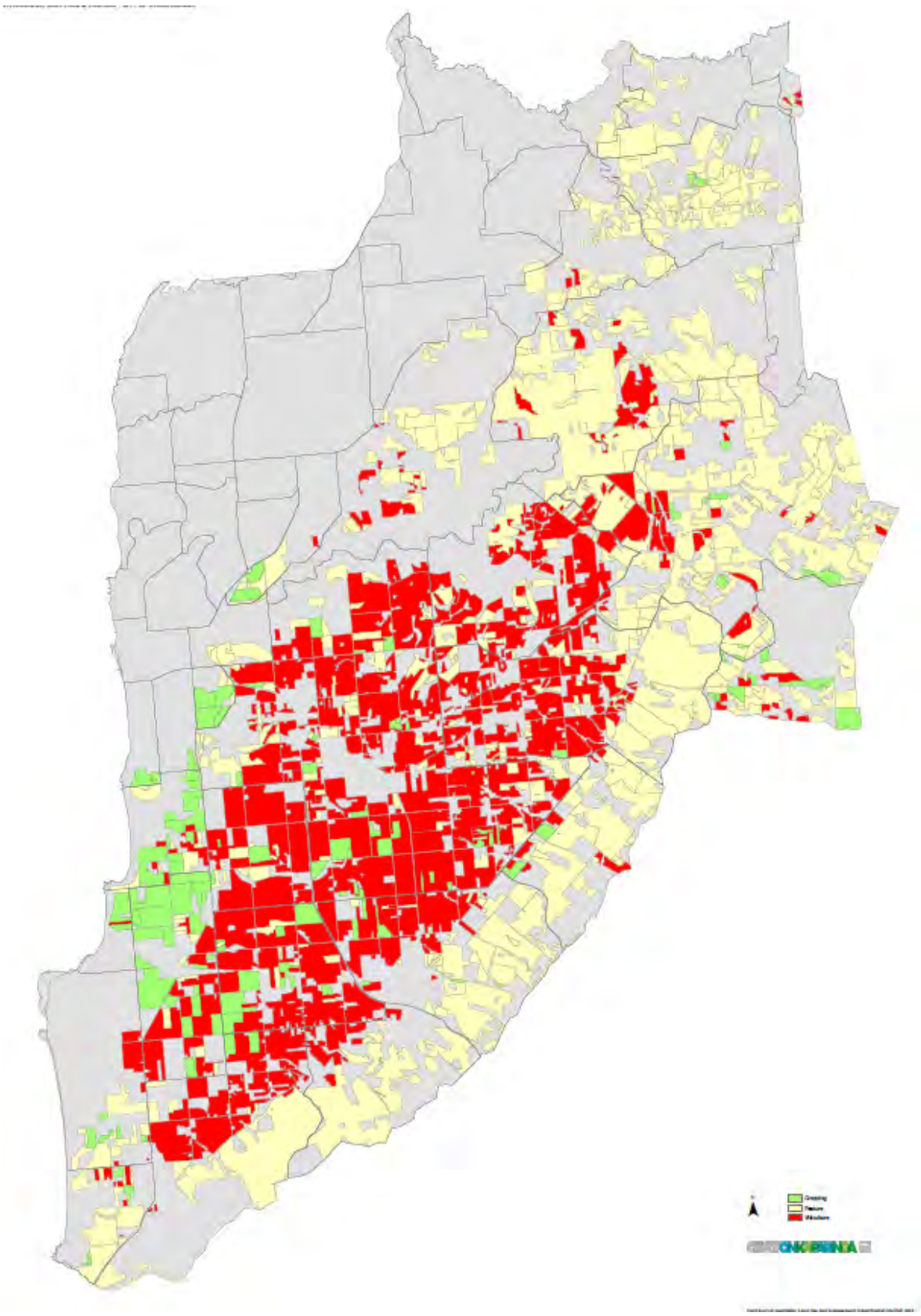


Figure 3: Area Under Vine, City of Onkaparinga via City of Onkaparinga Spatial Services  
Note: red areas = viticulture, green areas = cropping, yellow = pasture



Appendix 1 (Community Engagement Results Analysis by Mint Research) and Appendix 2 (submission from MVGWTA) will be included in this application as per attachment 2 and 4 of the Council report, if Council endorses this application to proceed.

DRAFT



**GENETICALLY MODIFIED CROP FREE DESIGNATION**  
City of Onkaparinga

**SUPPORTING DOCUMENTATION**  
McLaren Vale Grape Wine & Tourism Association

Tuesday 1 September 2020

Please find enclosed the following documents:

**TRADE TESTIMONIES**

- 1. d'Arenberg Wines**
  - i. Fort Wines & Spirit, Russia
  - ii. Vinetum, Finland
  - iii. Gusto World, Belgium
- 2. Paxton Wines**
- 3. Gemtree Wines**
  - i. Wine Exchange Asia, Singapore
  - ii. Tasty Brands, Denmark
  - iii. Vinovia Wine Group, US
  - iv. Ward Wines, Sweden
  - v. Better Solution International, China
  - vi. Chengdu Sacred Tree, China
  - vii. WineToChina, China
  - viii. European Council – Example Declaration of GMO Status
- 4. Yangarra Vineyard Estate Wines**
  - i. Allied Young, Korea
  - ii. Hangzhou Tangyuan, China
  - iii. Vinovativa, Sweden
  - iv. Boutino, UK
  - v. Fine Vintage Far East, Hong Kong

**LETTERS OF SUPPORT**

- 5. NASAA Certified Organic, Australia**
- 6. Australian Organic Limited, Australia**
- 7. Angoves Wines**

**POSITION STATEMENT**

- 8. Australian Organic Limited, Australia**



**McLaren Vale Grape Wine & Tourism Association**

**P:** +61 8 8323 8999

**W:** [www.mclarenavale.info](http://www.mclarenavale.info)

**E:** [info@mclarenavale.info](mailto:info@mclarenavale.info)



Friday, 21<sup>h</sup> August 2020

## To Whom It May Concern

### Request for the City of Onkaparinga to remain Genetically Modified Crop Free

d'Arenberg requests and supports MVGW&T to provide an application to the South Australian Minister for Agriculture, Food, Fisheries, Forests and Regional Development for the Local Government Area of Onkaparinga to remain GM Crop Free.

d'Arenberg is a five generation, 108 year old family business that exports to over 80 countries around the world. Harmony between environmental sustainability and wine industry practice is a strong commitment upheld by the company, with d'Arenberg estate vineyards receiving NASAA certification for organic and biodynamic processes since 2015.

In 2018, approval was granted by NASAA Certified Organic (NCO) to the winery which enables d'Arenberg estate wines to be labelled with full organic and biodynamic certification under the strictest international standards.

Please find attached a letter of support from NCO our organic and biodynamic certifying body. NCO is a fully owned subsidiary of the National Association for Sustainable Agriculture, Australia and provides the certification services to operators within Australia, its territories and internationally.

The real commercial risk associated to some of our key markets in Europe, Scandinavia and Russia on remaining a GMO-free region is outlined below.

d'Arenberg Wines total turnover in a normalised (non COVID affected year) **FY19 was \$1,194,207.23 AUD** across these markets;

- Germany
- The Netherlands
- Belgium
- France
- Ireland
- Denmark



- Sweden
- Finland
- Switzerland
- Norway
- Russia

We have provided letters of support from a small selection of our importing partners in these territories;

**Finland, Vinetum Premium Wines & Spirits**  
**Belgium, Gusto Creativventure Wines**  
**Russia, Fort Wines**

Enabling GM crops to be grown our wine production and wine tourism region will adversely impact d'Arenberg and the McLaren Vale region's brand equity and reputation, globally.

Kind regards

Philip Jeffries  
General Manager Sales & Marketing

August 19, 2020

Moscow, Russia

**Concerning: GMO**

We, Wine Trade Company “FORT”, inform you that we have a law № 358-FZ from 03.07.2016 prohibiting of GMO products in Russia. This law prohibits the production of GMO products on the territory of Russian Federation and also prohibits the import into the country of products containing GMOs or obtained with the use of GMOs.

That is why we support our producer d’Arenberg in their request to maintain McLaren Vale as a GMO free region.

If something changes and the use of GMO is allowed in McLaren Vale, then import to Russia will be impossible and our clients will no longer be able to enjoy the exquisite d’Arenberg wines.

Moreover, for d’Arenberg, the Russian market is economically important, exports to Russia is about AUD 250-300k annually.

Best wishes,

General Director of

LLC “Wine Trade Company “FORT”



/ Alexander Lipilin /

**VINETUM OY**  
Hietalahdenkatu 2 B 14 B  
00180 Helsinki  
Finland

Helsinki, the 21 of August 2020

Dear Sir / Madam,

We import d'Arenberg wines to Finland and we fully support their request to maintain McLaren Vale's status as a Genetically Modified Crop-Free region.

Permitting GMOs could harm d'Arenberg wines reputation in our markets and potentially affect negatively to McLaren Vale's reputation as a highly valued agriculture area. In Finland, there are hardly any genetically modified foods or drinks on shelves in stores at present.

We hope that your government will take the necessary measures to ensure that McLaren Vale remains GMO free region.



**CHRISTIAN MICKOS**  
Product Manager

**VINETUM OY**  
+358 10 423 4880  
Hietalahdenkatu 2 B 14b  
00180, Helsinki  
FINLAND  
VINETUM.COM

Creativenture SA  
Avenue de l'Energie, 6 - 4432 Alleur  
Tél. : +32 (0) 4 246 59 56  
Fax : +32 (0) 4 246 59 30  
info@gustoworld.com



Alleur, Belgium, Wednesday, August 19, 2020

I, the undersigned Christophe Heynen, MD of Creativenture SA, give my full support to d'Arenberg in their request to maintain McLaren Vale's status as a Genetically Modified Crop-Free region.

In case of a change in status that would permit GMOs, it would have as far as we are concerned disastrous impacts on the region's reputation, which is excellent today. It would inevitably affect the brand image of d'Arenberg and its wines – both known in our markets as respectful of nature -, and consequently jeopardize our longstanding relationship of trust. It would rule us out of tenders for which d'Arenberg wines are listed, decreasing business trade between us.

European consumers, and particularly people in the wine trade are increasingly sensitive as to agricultural practices of the products which they chose to purchase; a change to allow GMOs would inevitably cast doubt as to the region's long-term vision and definitely affect its international potential in our country.

We hope that your government will take the necessary measures to ensure McLaren Vale remains GMO free.



Christophe Heynen  
MD  
Creativenture SA  
BELGIUM



# PAXTON

McLAREN VALE

Monday August 31<sup>st</sup>, 2020

To Whom it may concern,

Paxton Wines request and support MVGW&T to provide to the South Australian Minister of Agriculture, Food, Fisheries, Forest and Regional Development for the Local Government Area of City of Onkaparinga to remain GM Crop Free.

Paxton is an organic and biodynamic viticulture and wine company certified by NASAA Certified Organics in Australia, Europe and USA. Paxton exports to over 25 countries with a strong focus in the US and Canada, Sweden, Finland, Norway, Denmark, as well as Holland and Russia.

The combined annual turnover of these export markets in a year unaffected by COVID-19 trading restrictions is more than AU\$1.2 million gross, totalling more than 11,000 cases of McLaren Vale wine (9L equivalents).

Enabling GM Crops to be grown in the City of Onkaparinga poses a genuine and immediate commercial risk to McLaren Vale's total wine grape production, worth more than AU\$65 million annually in farm gate value, of which nearly 40% is certified biodynamic or organic, including Paxton Wines. Consequently, there is a direct and immediate risk to our existing trade contracts and future commercial opportunities; we are at risk of losing \$1.2 million in combined sales overnight and we are just one producer out of 180 in McLaren Vale.

Paxton strongly feels that this region should remain GM free which will enable our business to continue trading with our international partners within the organic parameters under which our relationships have been built. Undoing this would be a travesty. McLaren Vale is Australia's leading organic and sustainable wine region! Why would jeopardising this, ever so current and topical eco brand be good for South Australia? Not only is this a step backwards for our region, it will reduce our export business globally, especially in the countries that have taken a strong stance against GM crops and are proactively increasing organic produce quota requirements in their markets.

"First and foremost, GM crops are a method of farming directly opposed to organic, biodynamic, green and sustainable farming. Paxton feels that GM Free is a positive marketing term in itself. The alternative of *We grow GM crops which means we can spray glyphosate over our crops* is not a positive message! The global movement towards healthy, sustainable, natural, low input produce is gaining momentum. The Paxton brand which is 100% certified organic and biodynamic is capitalising on the growth in this segment of the international wine market. Loss of certification would result in the loss of our main competitive advantages for brand Paxton. On a regional level, the years of hard work to position McLaren Vale region as clean, green and sustainable in the international marketplace would largely be negated with the approval of GM crops in our vicinity. If approved, GM crops in our region will be a major flaw in the McLaren Vale marketing story".

-Ben Paxton

"The tail seems to be wagging the dog here with the exemption for canola only bringing the one GM free state (South Australia) the associated marketing and health benefits into the mainstream for a minority of the agricultural community. It is a disgrace that only broad acre farmers were given a vote on this with the rest of the agricultural community left with the consequences. This is very bad for the clean South Australian image and I fully support the Fleurieu remaining GM free."

-David Paxton

Sincerely and strongly opposed,

Brian Lamb, Sales & Marketing Director  
With Ben and David Paxton, President & Founder  
Paxton Wines, McLaren Vale

28/08/2020

To Whom It May Concern,

## Request for the City of Onkaparinga to remain Genetically Modified Crop Free

Gemtree requests and supports MVGW&T to provide an application to the South Australian Minister for Agriculture, Food, Fisheries, Forests and Regional Development for the Local Government Area of Onkaparinga to remain GM Crop Free.

Gemtree wines is a third generation, family owned, viticulture, wine and tourism business. We are a grower of grapes and maker of organic and biodynamic wines. Harmony between environmental sustainability and wine industry practice is a strong commitment upheld by the company, with Gemtree receiving ACO certification for organic and biodynamic processes since 2013.

We export our wines to 12 global markets and host many international and domestic guests to our tasting room and vineyards each year. Our brand values and quality promise are built upon our and our region's environmental and sustainability credentials. This is a core pillar of our marketing and international trading strategies. This position we have attained through decades of work is at risk of being completely eroded by allowing GM farming into our region, it would cause irreparable damage to our historical trade and marketing efforts and significant disruption to our ongoing future trading. The real commercial risk associated is to some of our key markets in Europe with the requirement of supplying wine from a GMO-free region. We are confident this will be a rising global trend across our export markets and 1.7M worth of European wine distribution alone is at risk.

We have permission to advise support from the below importing partners;

- Wine Exchange Asia – Singapore
- Tasty Brands – Denmark
- Vinovia Wine Group – USA
- The Vinorium – UK
- Ward Wines – Sweden
- Better Solution International – China
- Chengdu Xiangrui Sacredtree International Trade – China
- WineToChina - China

Enabling GM crops to be grown our wine production and wine tourism region will adversely impact Gemtree and the McLaren Vale region's brand equity and reputation, globally.

Kind regards,



Mike Brown

Managing Director

# Gemtree

## **Supplier declaration according to Article 9(3) of Council Regulation (EC) No 834/2007**

Name & Address:

Identification of product (e.g. lot nr):

Product name:

I declare that this product was manufactured neither from or nor by GMOs as those terms are used in Articles 2 and 9 of Council Regulation (EC) No 834/2007. I do not have any information which could suggest that this statement is inaccurate. Thus, I declare that the above-named product complies with Articles 9 of Council Regulation (EC) No 834/2007 regarding the prohibition on the use of GMOs. I undertake to inform our customer and its control body/ authority immediately if this declaration is withdrawn or modified, or if any information comes to light which would undermine its accuracy. I authorize the control body or control authority, as defined in Articles 2 of Council Regulation (EC) No 834/2007, which supervises our customer to examine the accuracy of this declaration and if necessary, to take samples for analytic proof. I also accept that this task may be carried out by an independent institution which has been appointed in writing by the control body. The undersigned takes responsibility for accuracy of this declaration.

Signed by, date & Company stamp



31<sup>st</sup> August 2020

To Whom it May Concern,

**RE: City of Onkaparinga to remain Genetically Modified Crop Free**

Yangarra Estate Vineyard and Hickinbotham Clarendon Vineyard supports the position of McLaren Vale Grape Wine and Tourism Associations and The Onkaparinga Council to provide an application to the South Australian Minister for Agriculture, Food, Fisheries, Forests and Regional Development for the Local Government Area of Onkaparinga to remain GM Crop Free.

Yangarra Estate Vineyards are proud to be a biodynamic and organic property and have been certified since 2012. We have seen the improvement in our vineyard soils, grapes and people, which has led us to commence the conversion of our Hickinbotham Vineyard to also be certified organic and biodynamic. We believe the harmony between the environment and operating our vineyards organically is paramount for future sustainability.

There is real commercial risk associated to several key markets in Europe, Scandinavia, Asia, South Pacific, Canada and the United States of America for us to remain a GMO-free region.

Our total Export turnover in a non COVID affected year (FY19) was \$1,046,135.76 AUD across these markets;

- Belgium
- EU
- Scandinavia
- United Kingdom
- China
- Hong Kong
- Korea
- Singapore
- Taiwan
- Thailand
- Vietnam
- USA
- Canada
- Fiji

Jackson Wine Estates Australia Pty Ltd

Kangarilla Road, McLaren Vale 5171 • PO Box 222 Clarendon South Australia 5157  
Telephone: 08 8383 7459 Facsimile: 08 8293 7518 Email: yangarra.info@yangarra.com

www.yangarra.com ABN 64 112 285 908

Please find included letters of unanimous support from a small selection of our importing partners;

**Korea, Allied Young Fortune Brands Company**  
**China, Hangzhou Tangyuan Trading Co., Ltd**  
**Sweden, Vinovativa**  
**United Kingdom, Boutinot Wines**

Enabling GM Crops to be grown in McLaren Vale will not only have an adverse impact on Yangarra Estate and Hickenbotham Vineyard but to the reputation and growth of the region, which has been a leader in sustainability in the Australian Wine Industry. The Australian Wine Industry is already under enough pressure with Chinese international relations as well as the current economic conditions around the globe. Sustainable, clean and green production has been, and should remain a critical selling point to wine.

Yours Sincerely,



Peter Fraser

General Manager / Winemaker





3RD FL, HWAIN BLDG, 1-2  
YANGPYUNG-DONG  
YOUNGDEUNGPO-GU, SEOUL,  
KOREA  
T. 82-2-2175-0015  
F. 82-2-2175-0060

August 27<sup>th</sup>, 2020

We, AYOUNG FBC, the importer of S.Korea for Yangarra Estate wines, fully support maintaining McLaren Vale as a Genetically Modified Crop- Free region.

The GMO could harm the reputation of Yangarra wines and bring negative effect to our current market. Keeping the reputation of Yangarra is essential to the market which is excellent at the moment.

Allowing GMOs would bring doubts to the region and consumers will choose other products as they are more sensitive towards agricultural practices. With the GMO, it will bring an unhealthy result to the region when looking in the long-term.

We hope your government will take all these facts in consider and ensure to maintain McLaren Vale GMO free.

A handwritten signature in black ink, appearing to be 'Eun Jin Choi', written over a faint circular stamp or watermark.

**Eun Jin Choi**  
**Manager of Merchandising Team**  
**AYOUNG FBC**



杭州唐源贸易有限公司  
Hangzhou Tangyuan Trading Co., Ltd

Dear Sir/Madam,

We are the importer of Yangarra wines in the China mainland, we fully support their request to maintain McLaren Vale's status as Genetically Modified Crop-Free region.

Yangarra team has always been engaged in making natural and high quality certified organic wines that truly reflect the place they are grown. Permitting GMOs could definitely affect the brand image of Yangarra, it will also affect McLaren Vale's reputation as clean green and highly valued agriculture area. In China, very few people buy genetically modified foods or drinks.

We hope that your government will take necessary measures to ensure that McLaren Vale remains GMO free region.



地址：杭州市滨江区六和路 307 号中控集团大楼 E 区 24 楼  
Address: 24F, Supcon E Building, No.307 Liuhe Road, Binjiang Distric, Hangzhou, China.  
电话：+86-571-88303387 传真：+86-571-88303381  
Tel: +86-571-88303387 Fax: +86-571-88303381



Vinovativa  
Stockholm, Sweden

25/08/2020

Dear Sir/Madam,

We currently import Yangarra wines to Sweden for a listing that has just begun at Systembolaget (our monopoly) and we fully support their request to maintain McLaren Vale's status as a Genetically Modified Crop-Free Region.

Permitting GMOs could harm the reputation of Yangarra wines and the entire McLaren Vale region which is currently valued as a prime agricultural area.

In Sweden, there are not many Genetically Modified food or drinks available in stores at present. If so, they need to be clearly marked that they contain GMO ingredients. A big part of the consumer base are very reluctant to GMO products. We hope that your government will take the necessary measures to ensure that McLaren Vale remains a GMO free region.

Best regards,

Mikael Monteil

Founding Partner

**VINOVATIVA**

Växel/Switchboard: +46 8 444 61 70

Postal address: Box 27225, 102 53 Stockholm, Sweden

# Boutinot

WINES

Dear Sir/Madam,

27/8/2020

We currently import Yangarra wines to the UK and we fully support their request to maintain McLaren Vale's status as a Genetically Modified Crop-Free Region.

Permitting GMOs could harm the reputation of Yangarra wines and the entire McLaren Vale region which is currently valued as a prime agricultural area.

In the UK, there are not many Genetically Modified food or drinks permitted in stores at present. We hope that your government will take the necessary measures to ensure that McLaren Vale remains a GMO free region.

Best regards,

*Tony Brown*

TONY BROWN  
PRODUCT MANAGER

Direct Line: +44 (0)161 908 1364

Mobile: +44 7557 741090

# Boutinot

WINES

[www.boutinot.com](http://www.boutinot.com) | [Visit Boutinot's Blog](#) | [@boutinotwines](#)

Boutinot Ltd., Boundary House, Cheadle Point, Cheadle, Greater Manchester, SK8 2GG, UK  
Telephone +44 (0)161 908 1300 Facsimile +44 (0)161 908 1315  
Registered in England and Wales. Registered No 1530086



佳年洋行

**Fine Vintage (Far East) Ltd.**

Fine Wine Merchants Established since 1986

Hong Kong

31<sup>st</sup> August 2020

**TO: WHOM IT MAY CONCERN**

Dear Sirs,

I, the undersigned John Richard PAINE, Managing Director of Fine Vintage (Far East) Ltd. Hong Kong, certify that we import Yangarra Estate Wines into Hong Kong.

Peter Fraser, General Manager and Winemaker at Yangarra has asked me to support the mission to ensure that the McLaren Vale region, remains a Genetically Modified Crop-free Region.

We believe that allowing GMOs would greatly harm McLaren Vale's reputation as a specially respected agricultural area.

We hope that the state of South Australia will ensure McLaren Vale remains GMO free.

Yours faithfully,

J.R. Paine  
Managing Director



21/08/2020

Scott Ashby  
Chief Executive Officer  
City of Onkaparinga  
Po Box 1  
Noarlunga Centre SA 5168

Dear Scott,

**Re; Letter of support for McLaren Vale Grape Wine and Tourism Industry Association (MVGWTA) and D'Arenberg request to keep the City of Onkaparinga GMO crop free**

NASAA Certified Organic (NCO) certifies in 14 countries, and is in a unique position to be abreast of the driving factors for Australian organic product demand. Repeatedly, we hear how Australian organic products are perceived to be clean, green and safe. That our farming practices and certification verification activities are conducted to the highest standards of diligence and integrity. The gaining of this reputation has been the result of many years of hard work, and is undoubtedly of great economic benefit to Australia.

GMO's have been prohibited in the organic industry around the world since they were first introduced, and this will continue to be the case. Introducing the potential for GMO contamination in South Australia poses a direct risk to market access for certified organic operations.

Recent research indicates that GMO products are being significantly discounted in the marketplace, leading to reduced profits for Australian farmers and a detrimental result for the Australian economy. As at the 7<sup>th</sup> August 2020, GMO canola was discounted \$91/tonne vs non-GM in Western Australia, discounted \$60/tonne in Melbourne and \$40/tonne throughout regional NSW. Similar discounts to organic grape and wine prices in the Onkaparinga Region would have a significant impact on the economic viability of the industry.

Locally, NCO certifies 1,056 hectares of land in the Onkaparinga Region across a range of commodities, which equates to approximately \$3,400,000 in organic sales per annum. McLaren Vale has 37% of its area under vine certified Organic and Biodynamic, compared to a national average of 5%. Keeping this region GMO crop free is integral to its ongoing international status and access to export markets such as the EU.

We fully support the initiative of businesses and individuals in the City of Onkaparinga to petition for a regional moratorium. We encourage the Onkaparinga Council to declare the region GMO crop free, to maintain current local and international markets, and provide opportunity to enhance these markets into the future. There is significant potential for GMO free regions to develop additional market opportunities.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Tammy Partridge".

Tammy Partridge  
NCO General Manager



**Scott Ashby**  
**Chief Executive Officer**  
**City of Onkaparinga**  
**PO Box 1**  
**Noarlunga Centre**  
**SA 5168**

**13<sup>th</sup> August 2020**

**Dear Scott,**

**RE: Letter of support for McLaren Vale Grape Wine & Tourism Association (MVGWTA) and Gemtree request to keep the City of Onkaparinga GMO crop free.**

The global organic industry has excluded and prohibited GMOs and their derivatives, since their creation late last century. Organic farmers, consumers and industry members are committed to upholding the Precautionary Principle when considering all new technologies – and GMOs accordingly are excluded from organic production, and will continue to be so.

We often hear through our global network of organic industry stakeholders, that the clean green image of Australia, coupled with the best farming practices and stringent traceability assurances that organic certification provides, put Australian organic produce in the highest regard in the eyes of customers around the globe.

Australia is truly fortunate to hold this privilege, and we have no doubt our economy and the standard of living of for Australian citizens benefits greatly. The reputational synergy that occurs when Australian organic producers deliver high quality certified organic products to markets which also value our clean green image cannot be overstated.

We have heard anecdotally many times how South Australia's moratorium on GMOs boosted the reputation and marketability of produce sourced from the State, and boosted demand for premium South Australian organic products in valuable export markets.

We were dismayed to hear of the lifting of the State wide moratorium, however now see significant opportunity for Councils to put in place regional moratoria, and we wholeheartedly support this initiative of residents and businesspeople of the City of Onkaparinga in petitioning your Council to enact such a moratorium.

We implore you and your Council to declare your region GMO crop free, to create a beneficial point of difference for your region, in the great state of South Australia.

Yours sincerely,

**Niki Ford**  
**Chief Executive Officer**





## **Australian Organic Limited's statement of position on GMOs in Australian agriculture.**

### **Australian Organic Limited unequivocally supports the Australian Organic industry's long-standing exclusion of GMOs and their derivatives from organic and biodynamic production.**

The organic industry globally has excluded and prohibited GMOs and their derivatives, and AOL supports this position, to ensure GMOs and their derivatives are excluded from the organic supply chain entirely, which is in line with the well understood and appreciated expectation of organic consumers for such materials to be absent from the produce they are consuming, applying, or wearing.

AOL has been proactive in updating the Australian Certified Organic Standard (ACOS) to ensure domestic consumers, and lucrative export markets are protected from GMOs, especially in light of the Australian Government's decision to deregulate the SDN-1 gene editing method (by classifying it as non-GMO), by updating the ACOS in October 2019 (Notification 1903) to include SDN-1 by means of alignment with Codex Alimentarius GMO definition by adding, "encapsulation, gene deletion and doubling" to the definitions section of the ACOS.

In 2019 AOL similarly made a submission to the National Standards Subcommittee to amend the National Standard, to ensure clear classification of these new gene editing methods as GMOs.

The exclusion of GMOs and their derivatives from the organic and biodynamic supply chain protects Australian consumers, and ensures access to valuable export markets, and is achieved through strong wording in the National Standard for Organic and Biodynamic Produce 3.7 (NS), and in the Australian Certified Organic Standard 2019 v 1 (ACOS).

### **AOL supports the maintenance of the following sections of the National Standard for Organic and Biodynamic Produce 3.7:**

*1.2.6 GMO products are not compatible with organic and bio-dynamic management practices and are not permitted under a parallel production system.*

*1.7.3 The use of genetically modified/engineered seed and transgenic plants or the application of GMO derived substances for treating plants is prohibited in organic and bio-dynamic farming.*

*1.16.7 Prohibited feed products include, but are not limited to the following:*

*- GMO products or their derivatives.*

*1.17.8 Caution must be applied when using allopathic veterinary drugs as some medications (especially vaccines) may contain GMO or GMO derived substances. Where such medications are derived from GMO production, the animal(s) and/or their produce will never regain in-conversion, organic or bio-dynamic certification status.*

*2.3.7 Where cleaning or flushing procedures are used, the operator must ensure the removal of potential GMO contamination before organic and bio-dynamic produce is passed through the equipment.*

### **AOL ensures the exclusion of GMOs and their derivatives in produce certified to the ACOS for domestic and international sale by inclusion of the following clauses in the Australian Certified Organic Standard 2019 v1:**

*4.2.12. GMO products and GE processes are prohibited in all aspects of organic production systems*



*and products. This includes prohibition of GE seeds and propagative material.*

*4.7.14. Residues or cross-contamination of GMOs into certified crops or produce is prohibited.*

*4.7.17. GMOs and their derivatives are prohibited in all aspects of the organic production and consumption chain, including, but not limited to, vaccines used in livestock, bacterial strains, seeds and materials derived from GMO organisms.*

AOL is committed to the ongoing exclusion of GMOs and their derivatives from organic produce. We acknowledge the existence and growth in quantity and range of GMOs utilised in agriculture, and as such strive to support ongoing improvements in risk management activities such as buffer zone validation; supply chain segregation; quantitative and qualitative laboratory and field residue testing methods; education initiatives; and a healthy ongoing conversation about how farmers, and consumers can continue to choose how to farm, and what to eat.

END



**To Whom it May Concern**

**Request for the City of Onkaparinga to remain Genetically Modified Crop Free**

Angove Family Winemakers is a 5<sup>th</sup> generation family owned business established in 1886 and is one of South Australia's leading Organic grape growers and winemakers.

Angove Family Winemakers requests and supports MGVW&T to provide an application to the South Australian Minister for Agriculture, Food, Fisheries, Forests and Regional Development for the Local Government Area of Onkaparinga to remain GM Crop Free.

Enabling GM crops to be grown in the McLaren Vale wine production and wine tourism region will adversely impact the regions brand equity and reputation and has the potential to have significant commercial impact on our business.

Best Regards

Richard Angove

Joint Managing Director

Angove Family Winemakers



**YOUR SAY**

**Attachment 3**

# COMMUNITY ENGAGEMENT FEEDBACK REPORT

GENETICALLY MODIFIED (GM) CROPS 2020

## INTRODUCTION

The moratorium on growing Genetically Modified (GM) crops in South Australia was lifted by the state government on 15 May 2020, except for Kangaroo Island.

For a short time, local councils can make a request to the Minister for Primary Industries & Regional Development to designate our council area as a non-GM crop area - this would mean no GM crops could be grown in the area. The state government has told us this is a once-off opportunity.

When making his decision, the Minister will only consider evidence related to the trade and marketing impact of GM crops. This includes whether or not local food producers and manufacturers can demonstrate that their capacity to market and export their product would be affected by our area's GM status.

The state government has advised that any councils who prepare a request to the Minister must *'consult with its community, including persons engaged in primary production activities and food processing or manufacturing activities in the area of the council'* before applying to the Minister for designation.

It will be up to the Minister what he considers when making his decision on an application from a council to be a non-GM crop area. However, based on a letter from Michelle Edge, Chief Executive, Primary Industries and Regions SA to our CEO on 3 June 2020 we know the Minister will have a strong focus on the GM implications for trade and marketing. This is because other factors associated with GM technology are the responsibility of federal government.

## COMMUNITY ENGAGEMENT PURPOSE & OBJECTIVES

The purpose of the engagement as described in the approved community engagement plan was:

We will seek community input to decide if we will ask the Minister to designate the City of Onkaparinga region as a non-GM crop area. We will focus on reaching those most directly affected by GM cropping – primary producers, and food processors and manufacturing.

It is important to understand the default position is that GM crops are permitted in our region, based on the state government's legislation change that has already taken place.

We are open to all feedback received during this engagement. However, if we do make an application to the Minister, the trade and marketing factors are what he will focus on when making his decision.

For this reason, while we will invite feedback from anyone with an interest, we will have a particular focus on submissions provided by stakeholders most directly affected by trade and marketing factors.

This will help Council develop a clear position on what the evidence says about how GM crops could affect local livelihoods and important agricultural industries in our City.

The objectives of the engagement as described in the approved community engagement plan were:

Collate and analyse community feedback to enable Council to make an informed decision about whether or not to apply to the Minister for Primary Industries, asking him to consider designating the City of Onkaparinga a non-GM crop area, by:

- communicating the state government's legislation change to our communities, and focusing on the facts

- helping our communities understand the scope of influence council and our businesses and residents have in this matter, and that trade and marketing factors will be the focus of the Minister if Council decides to make an application.
- clearly articulating that council does not have a position on GM crops
- seeking to understand the trade and marketing implication (positive, nuanced or negative) of GM crops on key stakeholders
- separating the input from our communities into key, secondary, and other stakeholder groups to help us better understand the feedback.

## ENGAGEMENT PROMOTION & TECHNIQUES

From 22 June to 26 July 2020 we asked our communities to tell us their thoughts and experience regarding the trade and marketing impact of GM crops. Our promotion for the community engagement included:

- letters mailed to the 2072 primary producers in our region
- emails to 13 business and tourism associations and markets
- emails to members of parliament
- roadside banners in 10 locations around our region
- posters in the Clarendon General Store, Kangarilla Post Office and the Home Grain Bakery at McLaren Flat
- a Facebook post
- information on our main website ([www.onkaparingacity.com](http://www.onkaparingacity.com))
- a dedicated page on [Your Say Onkaparinga](#)
- an email to all of the registered members on Your Say Onkaparinga.

Examples of the promotion are provided in attachment 1. Each aspect of the promotion pointed people to the Your Say Onkaparinga page, where stakeholders could provide input via an online survey. We also welcomed [written submissions](#) and reports that might provide relevant evidence.

Subsequent to the survey closing, we continued to collect and analyse evidence/on-going interest and input and have also taken this into consideration, and while this was not included in the data analysis, we collated and summarised this additional feedback to make it available for consideration by elected members.

## SUMMARY OF COMMUNITY ENGAGEMENT OUTCOMES

### Reach of the promotion

The 30 June Facebook post reached a total of 10,618 people, with 898 engagements (710 post 'clicks' and 188 reactions/comments/shares).

819 people visited the Your Say Onkaparinga page during the main consultation period (22 June to 26 July).

### Participation during the main consultation period

During the consultation period we received 314 valid survey responses, and 46 written

submissions (via email or letter).

Of the responses received, 88 were from the key stakeholder group (primary producers, food processors and fresh produce sellers), with some of those being from associations that represent a large member base.

We also received **12 questions** from community members through the online Q&A tool. Where relevant the questions were answered publicly to share the information with all stakeholders.

### Participation after the close of the main consultation period

After the close of the engagement period on 26 July we continued to receive written submissions and questions via the Q&A tool. At the time of writing a total of **17 additional submissions** have been received, and we responded to **one additional question**.

A list of submissions is provided in attachment 2, and the submissions themselves can be viewed on the [Your Say Onkaparinga page](#).

### Analysis of the data

We contracted Mint Research to analyse the data received during the main consultation period, and they provided a report with their findings. Highlights from the Mint report found that:

- 70% of key stakeholders and 80% of the general community that responded said we should apply to the Minister for our region to be GM crop free.
- 73% of those key stakeholders wanting us to apply to be GM-free cited trade and marketing reasons
- Along with the above sentiment, the consultation also requested that responders provide evidence to back their position (related to trade and marketing):
  - No contracts or region-specific studies were provided during the consultation period to either support or not support an application to the Minister.
  - Much other evidence was provided by both those arguing for and against designation as GM-free, including references to price guides for different crops, academic articles, media articles, independent reviews and consumer purchasing guides.

The full analysis was provided to elected members as pre-reading for their workshop on 25 August.

All submissions received to date were also provided to elected members as pre-reading, including those that were received after the close of the consultation (and not included in the data analysis).

## EVALUATION

Evaluation is measured against the project engagement objectives listed in the engagement plan (see above). All of the objectives were achieved.

Our combination of broad (e.g. Facebook post and roadside banners) and targeted (e.g. letters and emails to key stakeholders) promotion resulted in 819 unique visitors to the Your Say Onkaparinga page and 314 surveys and 63 submissions being received. Many of these were from key stakeholders.

In addition to the promoted engagement, we received further evidence on the trade and marketing implications of GM crops in our region.

This information provides a strong basis on which Council will be able to decide whether to make a

request to the Minister for Primary Industries & Regional Development to designate our council area as a non-GM crop area.

## SIGN OFF

### Officer who prepared the document

Name: Dale Sutton  
Position Title: Team Leader Engagement and Grans  
Date: 8 September 2020

### Reviewed by

Name: Ynys Onsman  
Position Title: Manager Strategic Futures (acting)  
Date: 8 September 2020

# EXAMPLES OF PROMOTION

## Roadside banners



Lions Park, McLaren Flat



Kangarilla Recreation Ground

## Posters

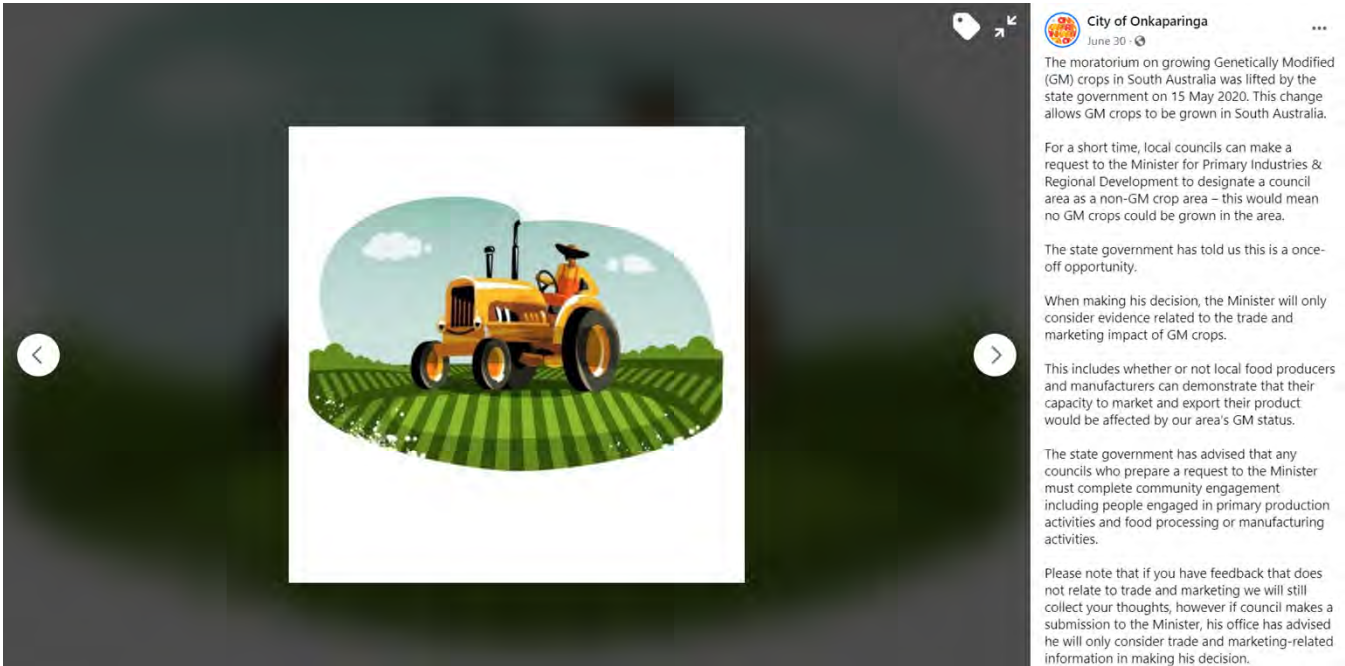


Clarendon General Store



Kangarilla Post Office

Facebook post



**City of Onkaparinga**  
June 30 · 🌐

The moratorium on growing Genetically Modified (GM) crops in South Australia was lifted by the state government on 15 May 2020. This change allows GM crops to be grown in South Australia.

For a short time, local councils can make a request to the Minister for Primary Industries & Regional Development to designate a council area as a non-GM crop area – this would mean no GM crops could be grown in the area.

The state government has told us this is a once-off opportunity.

When making his decision, the Minister will only consider evidence related to the trade and marketing impact of GM crops.

This includes whether or not local food producers and manufacturers can demonstrate that their capacity to market and export their product would be affected by our area's GM status.

The state government has advised that any councils who prepare a request to the Minister must complete community engagement including people engaged in primary production activities and food processing or manufacturing activities.

Please note that if you have feedback that does not relate to trade and marketing we will still collect your thoughts, however if council makes a submission to the Minister, his office has advised he will only consider trade and marketing-related information in making his decision.

## LIST OF SUBMISSIONS RECEIVED

During the engagement period (and included in the data analysis by Mint Research)

### Representative associations/businesses/special interest groups

- Grain Producers SA
- NASAA Organic
- Altschwager Kenneally Winemakers
- Keep SA GM Free
- McLaren Vale Grape Wine and Tourism Association (MVGWTA)
- McLaren Vale Business and Tourism Association
- Viticol Pty Ltd
- Moana Bed and Breakfast

### Community members

- Palitja Moore
- Joy Danielson
- Anne Chittleborough
- Graham Brookman
- Trevor Hywood
- Genevieve Wallfried
- M Hawk
- Robyn Holtham
- Jamie Wilson
- Vicki Biddle
- Bronwyn Gilchrist
- Hazel Francis
- Lesley Barnard
- Robert Fildes
- Bill Davis
- A Joubert
- Rhonda Darroch
- Andrea Merrigan
- Amy Slender
- Catherine Laing
- Dianne Schohinger
- Jackie Thomson
- Helen Nitschke

- Helen Rochford
- Darcy Lunn
- Helen Rodbourn
- Liz Docker
- Malgoratz Schmidt
- Nedha Butt
- Deb Mathews
- Ananta Irvine
- Troy Minter
- Kate Clinch-Jones
- Thelma Goldsmith
- Steve Evans
- Maria Vouis
- Meredith Hall
- Rod Brown
- Reg and Kay Cazzolato

#### After the close of the main engagement period

##### Representative associations/businesses/special interest groups

- Business and Tourism Aldinga
- Australian Organic
- Keep SA GM Free (additional information)
- Grain Producers SA (additional information)
- Agricultural Biotechnology Council of Australia Limited

##### Community members

- Heather Mitchell
- Kim Jarmyn
- Amanda Carapetis
- James Golding
- Margaret Scrimgeour
- Graham Brookman (additional information)
- Carolyn McMahon
- Trevor Hywood (additional information)
- Michelle McLaren
- Scott Morrison
- Anja Jagsch
- Monika Quattrocchi
- Josephine Robinson

- Julie Newman
- Bert and Meredith Swalue
- Sarae Adamopoulos

To view the submissions please go to the Your Say Onkaparinga page:  
<https://yoursay.onkaparinga.sa.gov.au/gm-crops>

# Genetically Modified Crops Legislation Change

## ENGAGEMENT SUMMARY REPORT

Prepared for the City of Onkaparinga

Prepared by Mint Research Pty Ltd

September 2020

# PREAMBLE

In July 2020, Mint Research was commissioned by the City of Onkaparinga Council to provide analysis services to support the community engagement on whether or not the council should ask the Minister to designate the City of Onkaparinga region as a non-GM crop area.

Council developed the survey tool and managed the collection of survey data as well as written submissions. Mint Research assisted in the preparation, analysis and collation of surveys and written submissions.

The purpose of this report is to represent submissions and stakeholder feedback in order for council to decide if they will ask the Minister to designate the City of Onkaparinga as a non-GM crop area. This report does not provide a stance or recommendation for what council's position should be.

This report is divided into three sections detailing distinct stakeholder needs and perspectives:

1. Key stakeholders: Primary producers & food manufacturers in the region, organisations representing primary producers and food markets in the region; and other businesses in the City (not primary producers or food manufacturers);
2. Secondary stakeholders: Business and Tourism Associations; and
3. General community: Residents of the City; the general public living outside of the City (e.g. visitors, workers); businesses outside of the City; and special interest groups.

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# EXECUTIVE SUMMARY

# FINDINGS AT A GLANCE

KEY STAKEHOLDERS		SECONDARY STAKEHOLDERS		GENERAL COMMUNITY	
Should council apply to the minister to designate the city a non-GM crop area?					
YES 70% + 3 submissions	NO 30% + 1 submission	YES 1 survey + 2/3 submission	NO 1/3 submission	YES 80% + 13 submissions	NO 20% + 1 submission
Were trade and marketing impacts cited as reasons underpinning GM position?					
YES 73% + 3/3 submissions	YES 42% + 1/1 submissions	YES 2/2 members in submission only	YES 1/1 members in submission only	YES 42% + 8/13 submissions	YES 49% + 1/1 submission
Was evidence provided to show impacts to trade and marketing?					
YES 1 survey + 2/3 submissions	YES 0 surveys + 1/1 submissions	NO	NO	YES 4 surveys + 7/8 submissions	YES 2 surveys + 1/1 submission
There was no evidence provided specific to the City of Onkaparinga (e.g. contracts or studies in the region).		No evidence was provided.		There was no evidence provided that was specific to the City.	
Independent Review (Anderson, 2019), national & global consumer & shopper studies, wine industry figures (PIRSA), Review of Tasmania's GMO Moratorium, Grain Growers report, 2 key submissions to KI engagement	Independent Review (Anderson, 2019), Analysis of price premiums (Mercado 2017), other financial & crop strength studies for canola & cotton, economic costs of delayed GM crop adoption			University of Adelaide Centre for Global Food and Resources report for PIRSA (2016), national and global consumer studies, export quotes of financial impact, 2 key submissions to KI engagement, Review of Independent Review, media articles	Independent Review (Anderson, 2019), Productivity Commission Inquiry Report (2016), Meta-analysis of impacts of GM crops,

SENTIMENT TRADING & MARKETING IMPACTS

## KEY STAKEHOLDER INDUSTRY HIGHLIGHTS

In 2018-19, beverage manufacturing contributed the most to the region's total exports (\$445.9M; 23%). This accounts for 15% of the state's total exports of beverage products.

The region's agriculture industry sector contributed \$38.4M (2%) to the region's total exports in 2018-19 (0.7% of the state's total exports of agriculture products).

The region's Agriculture, Forestry and Fishing Industry as a whole comprises grape growing businesses (35.7%), followed by livestock farming (16.1%), and fruit and vegetable growing (3.2%).

The survey sample reflected the region's skew towards grape growing and wine making industry groups, with the largest contribution to the survey from businesses of these types.

Overall, these industry groups were represented by 61% of primary producers / food manufacturers (n=46\*) who completed the survey, and 3 out of the 4 key stakeholder submissions.

The remaining 29 primary producers were from a variety of other industry groups.

\* Base sizes for questions may vary throughout based on some respondents who skipped questions

# SUMMARY OF KEY STAKEHOLDER RESPONSES

Key stakeholders, comprising primary producers, food manufacturers, organisations representing primary producers and food markets, and other businesses in the City, are the core interest group for this engagement. Overall, n=88 key stakeholders completed the survey and 4 provided a written submission.

KEY STAKEHOLDERS

Overall, the majority of key stakeholders are in support of designating the City of Onkaparinga a non-GM crop area.

(This finding is driven largely by primary producers in the grape and wine industry groups as the largest number of surveys was received from this group.)

Of those in support of designating the City a non-GM crop area, nearly three quarters of supporters cited detriment to trade and marketing as reasons underpinning this.

Of those in favour of GM cropping, two in five cited trade and marketing benefits.

## SUPPORT CITY TO BE DESIGNATED A NON-GM CROP AREA BASED ON TRADE / MARKETING

70% survey respondents

- 70% primary producers / food manufacturers
  - 73% grape + wine
  - 64% all other industry groups
- 100% organisations representing primary producers / food markets\*\*
- 57% other businesses in the City\*\*

3 submissions

- 2 primary producers / food manufacturers (A and K wines, Viticol)
- 1 organisation representing primary producers / farmers markets (McLaren Vale Grape, Wine & Tourism Association)

TRADE / MARKETING detriment cited by  
73%  
3/3 submissions

OTHER detriment cited by  
27%  
1/3 submissions

Key concerns included damage to the reputation and point of difference (marketable advantage) of the region, closely followed by concerns over serious risk (and financial implications) of cross-contamination from neighbouring GM growers.

## AGAINST / UNSURE ABOUT CITY BEING DESIGNATED A NON-GM CROP AREA BASED ON TRADE / MARKETING

30% survey respondents

- 30% primary producers / food manufacturers
  - 27% grape + wine
  - 36% all other industry groups
- 0% organisations representing primary producers / food markets\*\*
- 43% other businesses in the City\*\*

1 submission

- 1 organisation representing primary producers (Grain Producers SA)

TRADE / MARKETING benefits cited by  
42%  
1/1 submission

OTHER benefits cited by  
83%  
1/1 submission

Key reasons in favour of growing GM crops included financial gains from more efficient farming methods, crop strength and yield, and a lack of evidence to suggest financial loss from allowing GM crops in the area.

\* Caution: Small base sizes less than 30

\*\* Caution: Very small base sizes less than 10

# SUMMARY OF SECONDARY STAKEHOLDER & GENERAL COMMUNITY RESPONSES

Secondary stakeholders comprised business and tourism associations, and the general community comprised residents of the City, general public and other businesses outside of the City, and special interest groups. These stakeholder groups were considered second to key stakeholders. Overall, n=1 secondary stakeholder completed a survey and another provided a written submission; n=225 of the general community completed a survey and 14 provided a written submission.

SUPPORT CITY TO BE DESIGNATED A NON-GM CROP AREA BASED ON TRADE / MARKETING

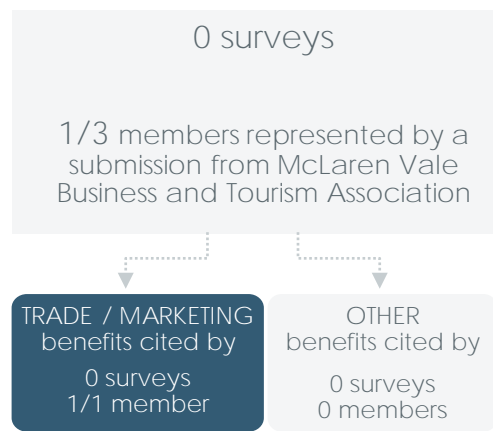
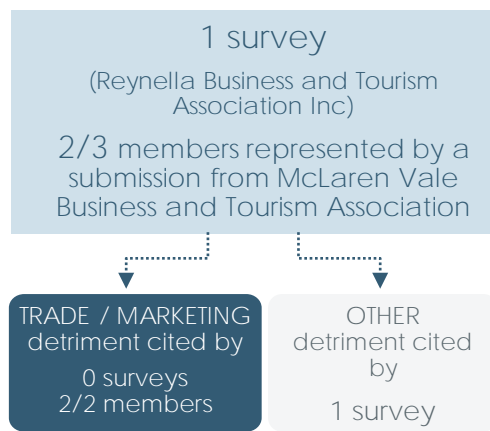
AGAINST / UNSURE ABOUT CITY BEING DESIGNATED A NON-GM CROP AREA BASED ON TRADE / MARKETING

Secondary stakeholders did not make a substantial contribution to this engagement, making in depth analysis not possible.

SECONDARY STAKEHOLDERS

Overall, one survey was completed and one submission (representing three members – two in support, one against) was received.

Trade and marketing reasons were mentioned exclusively in the submissions, but not in the survey.

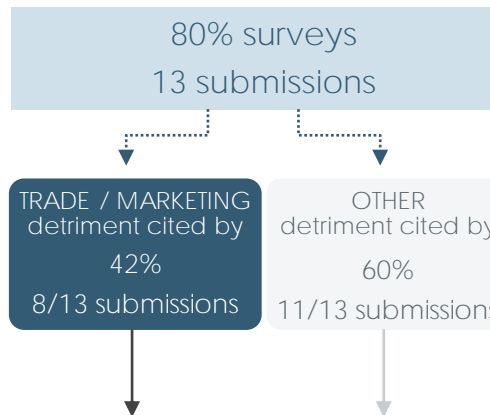


GENERAL COMMUNITY

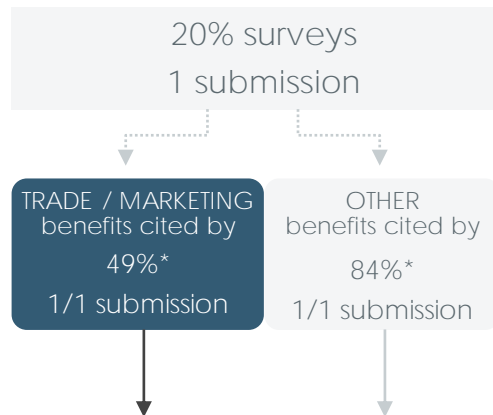
Overall, four in five in the general community are in support of designating the City of Onkaparinga a non-GM crop area.

Of supporters of designating the region a non-GM crop area, two in five cited detriment to trade and marketing as reasons underpinning this.

Of those in favour of growing GM crops in the region, around half cited trade and marketing benefits of GM cropping.



Key concerns were detriment to the region's reputation and image, but this was equal with their concerns about negative (and unknown) impacts to health and safety.



Key reasons in favour of allowing GM cropping in the region included the lack of evidence and known risks to health and safety, and allowing primary producers and food manufacturers to have choice over this decision for what's best for their business.

# BACKGROUND CONTEXT AND CONSULTATION OVERVIEW

# Engagement context & objectives

## Background context

In May 2020, the state government passed legislation that lifted the moratorium on growing genetically modified (GM) crops in South Australia. Councils have been given a one-off opportunity to apply to the Minister for Primary Industries asking for their City to remain as a non-GM crop area.

Under a policy principle established within the *Gene Technology Act 2000*, the moratorium existed for trade and market access purposes. Thus for the purposes of this engagement, it was made clear that the focus is on trade and marketing considerations.

If council chooses to submit an application, it must demonstrate community consultation and comprise perspectives and evidence provided from residents and businesses affected as to the impacts. Each council was directed to “consult with its community, including persons engaged in primary production activities and food processing or manufacturing activities in the area of the council” before applying to the Minister for designation.

## Community engagement mechanisms

In July 2020, council provided the community of primary producers, food processors and manufacturing businesses, food retailers, and residents with the ability to engage and provide their perspectives of the impacts of this change.

Feedback was encouraged via a survey developed by council (available via Your Say Onkaparinga from 22<sup>nd</sup> June to 26<sup>th</sup> July 2020). Written submissions to Council were also encouraged and accepted. Promotion was undertaken via emails/letters to MPs, key and secondary stakeholders, social media posts and roadside banners.

## Engagement objectives

The objective of the engagement was to assist Council to make an informed decision about whether to apply to the Minister for consideration of the City of Onkaparinga to be designated a non-GM crop area.

The following engagement questions have been addressed in this engagement report:

1. What is the preference of each of the stakeholder groups regarding growing GM crops in the region?
2. How many stakeholders cited trade and marketing impacts? What were these and were they positive or negative?
3. What (if any) evidence was provided to demonstrate these impacts?

## The survey

Council invited feedback from anyone with an interest in GM crops, with a particular focus on feedback and submissions provided by stakeholders most directly affected by trade and marketing factors - i.e. primary producers and food manufacturers in the region, organisations representing primary producers and food markets, and other businesses in the City. (More information about stakeholder groups are overleaf.)

The key question all stakeholders were asked in the survey was their support for Council applying to the Minister asking that the City of Onkaparinga is designated as a non-GM crop area based on trade and marketing implications. (All survey respondents were also given the option to upload an attachment and/or insert a link to support their position.)

Questions asked in the survey can be seen at Appendix C.

# Analysis detail

## STAKEHOLDER TYPES

Based on engagement responses, stakeholder groups were categorised as the following:

### Key stakeholders:

1. Primary producers & food manufacturers in the City, n=75 surveys (2 included an attachment) + n=2 written submissions. Survey respondents spanned the following industry groups:
  1. Grape growers + wine manufacturers n=46
  2. All other industry groups n=29.
2. Organisations representing primary producers and farmers markets in the City, n=4 surveys (1 included an attachment) + n=2 submissions.
3. Other businesses in the City (not primary producers / food manufacturers), n=9 surveys (no attachments or written submissions).

### Secondary stakeholders:

1. Business and Tourism Associations, n=1 completed survey + n=1 submission

### General community:

1. Community residents / special interest groups, n=187 surveys (18 with attachments / links) + n=13 handwritten submissions + 27 template submissions (in support of making the region as a non-GM crop area);
2. The general public living outside of the City (workers / investment property owners / visitors), n=31 surveys (no attachments or written submissions);
3. Businesses outside of the City, n=7 surveys (no attachments) + n=1 submission.

## SURVEY ANALYSIS

Overall, n=390 online surveys were collected. During the data cleaning and preparation process, n=76 entries were removed for the following reasons:

1. Duplicated survey responses, based on IP address combined with identical demographic details and open-ended responses (n=39);
2. Commencement of the survey only, without proceeding past the initial identification question, providing no additional feedback (n=27); and
3. Response was from an organisation or individual that was not genuine or the response itself was nonsensical (n=6);
4. Duplication of a written submission (n=4).

The resulting overall sample size available for analysis was n=314, however, some respondents left some questions blank so base sizes may vary depending on question (e.g. n=81 key stakeholders responded to the main question asking if they support the City to be designated a non-GM crop area).

Quantitative proportions have been stated for stakeholder groups and subgroups where data permits. However, caution must be exercised when interpreting findings from smaller sample sizes. Samples less than n=30 have been marked with an asterisk, and samples less than n=10 have been marked with two asterisks and raw counts provided.

On some charts, percentages of less than 3% have been removed for simplicity.

Attachments and links provided in the survey were also analysed, in the same manner to the analysis of submissions (see below).

## ANALYSIS OF SUBMISSIONS AND SURVEY ATTACHMENTS

The total number of submissions received was 21. Of these:

1. Four were received from key stakeholders (two from primary producers / food manufacturers in the City, two from organisations representing businesses in the City);
2. One was from a secondary stakeholder (representing views of three member submissions); and
3. Fourteen were from the general community (residents of the City, a special interest group and a business not located in the City).

In order to understand, analyse, compare and collate the different submissions, a framework was used against which to assess each submission in terms of its composition. The same process was undertaken to examine survey attachments where these were included. The framework comprised:

- Position on GM crop growing in the area
- Reasons provided to underpin GM position
  - Trade / marketing impacts – Y/N
  - Other impacts (e.g. health, environmental) – which?
- Any supporting evidence cited – Y/N
  - Evidence relating to – financial / marketing impacts / other impacts
  - Type of evidence – e.g. meta-analysis / independent review, scientific article, financial modelling, industry data, media article, opinion piece, etc.
  - Year published
  - Location of study / subject – e.g. which region / state / country

Note: Analysis of submissions was undertaken in order to collate engagement feedback and not to review or evaluate the evidence referenced in submissions. The framework referred to above was used as a reductive technique to underpin this collation process only.

# About this report

The report has been split into three sections:

1. Key stakeholders
2. Secondary stakeholders
3. General community

Each section comprises the metrics collected specific to the target audience in the survey, as well as submissions from each respective group.

Business and organisation names of submitters and survey respondents can be seen at Attachment B (except for where the request to remain anonymous has been made).

To simplify footers:

- Primary producers / food manufacturers have been referred to as *PPs / FMs*;
- Organisations representing primary producers and food markets have been referred to as *Orgs rep PPs / FMs*;
- Other businesses in the city (not primary producers or food manufacturers have been referred to as *Other bus in City (not PPs / FMs)*.

Direct quotes have been included where they support a common point, appearing in inverted commas. Quotes are de-identified to ensure respondent anonymity, and only included with opt-in consent.

The purpose of this report is to represent submissions and stakeholder feedback in order for the council to decide if they will ask the Minister to designate the City of Onkaparinga as a non-GM crop area. This report does not provide a stance or recommendation for what council's position should be.

Economic quantification of costs and benefits of designating the City of Onkaparinga as a non-GM crop region have not been made; this is a collation of engagement findings only.

# INDUSTRY OVERVIEW

ESTABLISHING THE CONTEXT AND RELEVANCE OF THIS CONSULTATION WITH TWO  
OF THE REGION'S KEY INDUSTRIES

# Industry sector analyses

Industry sector analysis was undertaken using the statistics available from the Australian Bureau of Statistics (2020) and the National Institute of Economic and Industry Research (2019). The demographics of business survey respondents have been compared to industry statistics to determine the representativeness of the key stakeholder groups in the survey.

There are many ways to analyse business data for the City of Onkaparinga. This analysis presents a selection including output (total sales: \$ and % region compared to % SA), total exports (\$ and % region compared to % SA), numbers of registered businesses in the region, and land use.

Looking firstly at *output (total sales)* by industry sectors in the City of Onkaparinga (2018/19), the three largest industries were:

1. Construction (\$1,512M; 18.7%);
2. Manufacturing (\$1,222M; 15.1%) – of which Food Product and Beverage Manufacturing are core industries; and
3. Health Care and Social Assistance (\$736M; 9.1%).

This is the same for South Australia, whereby 13.9% output is accounted for by Construction, 10.5% is accounted for by Manufacturing and 8.1% by Health Care and Social Assistance. Based on the *number of businesses in the region*, Construction is again the largest, Manufacturing is the 4<sup>th</sup> largest industry sector, and Agriculture is the 6<sup>th</sup> largest.

Looking more closely at the Manufacturing industry sector in the City of Onkaparinga, we can see that it has the largest total exports, generating \$820M in 2018-19; 43% of the **region's** total exports, and 18.6% of the **state's** total exports.

More granular analyses of the Manufacturing industry sector shows...

Beverage Manufacturing in the City of Onkaparinga:

- Comprises 14.4% of the **state's total sales (output)** of beverage products (\$442M), and the **region's** total sales are proportionally four times higher than that of the state (beverage manufacturing contributes to 5.5% output of the region compared to 1.6% of that of the state); and
- Comprises 14.8% of the **state's total exports** of beverage products (\$445.9M), and is overrepresented again (it makes up 23% of the **region's** total exports, compared to 4% of that of the state).

Food Product Manufacturing in the region:

- Comprises 2.2% of the **state's output** of food products (\$95.1M), and is underrepresented in the region compared to the state (such that it makes up 1.1% of the **region's** output compared to 2.3% of that of the state); and
- Comprises 1.3% of the **state's total exports** of food products (\$32.3M), and is underrepresented again (it contributes to 1.7% of the **region's** total exports, compared to 3.3% of that of the state).

While the Agriculture, Forestry and Fishing industry sector is the 6<sup>th</sup> largest industry in the region based on business numbers, primary production accounts for 65% of the region's *land use*, demonstrating its importance to the region.

The Agriculture industry in the region:

- Comprises 2.4% of the state's *output* of agricultural products (\$200.2M), and is underrepresented here (it contributes to 2.5% of the region's output, compared to 4.2% of that of the state); and
- Comprises 0.7% of the states *total exports* (\$38.4M), and is underrepresented again; (it makes up 2% of the region's exports compared to that of 7.4% of that of the state).

The region's Agriculture, Forestry and Fishing Industry as a whole is comprised of 35.7% grape growing businesses, 16.1% livestock farming businesses, and 3.2% fruit and vegetable growing businesses.

Comparing industry to the survey sample

A core part of the analysis in this report requires combining primary producers and food manufacturers into one key stakeholder group. In order to do this logically and base this on like industry groups across the three industries (Agriculture, Food Product Manufacturing, and Beverage Manufacturing), the following was observed for the primary producer and food manufacturer survey sample:

1. Grape growers and wine making/manufacturers: 56% of business survey respondents;
2. Non-dairy sheep and beef cattle farmers + and meat processors: 22% of business survey respondents;
3. Grain farmers and bakery product manufacturers: 8% of business survey respondents; and
4. Fruit and vegetable growers and processors / manufacturers: 10% of business survey respondents.

For the purposes of analysis, responses of grape growers (primary producers) and wine makers (beverage manufacturers) have been grouped, and examined in comparison to net responses of those across all other industry groups (sample sizes were too small to examine groups at a more granular level).

Sources: Australian Bureau of Statistics. (2020). Agricultural commodities, Australia–2018-19. [Data cube]. Agricultural commodities, state and SA4 region–South Australia–2018-19. Accessible at: [https://www.abs.gov.au/ausstats/abs@nsf/mf/7121\\_0](https://www.abs.gov.au/ausstats/abs@nsf/mf/7121_0) Retrieved 21 July 2020.  
National Institute of Economic and Industry Research (NIEIR)©2019 and Australian Bureau of Statistics (2020). Compiled and presented in economy.id. Data are based on a 2016-17 price base for all years. NIEIR-ID data are inflation adjusted each year to allow direct comparison, and annual data releases adjust previous years' figures to a new base year. Accessible at: <https://economy.id.com.au/onkaparinga/industry-sector-analysis?IndkeyNieir=23001&sEndYear=2018> Retrieved 21 July 2020.

Note: Business respondents in the survey were able to select more than one industry group; 37% of businesses indicated they belonged to more than 1 industry group

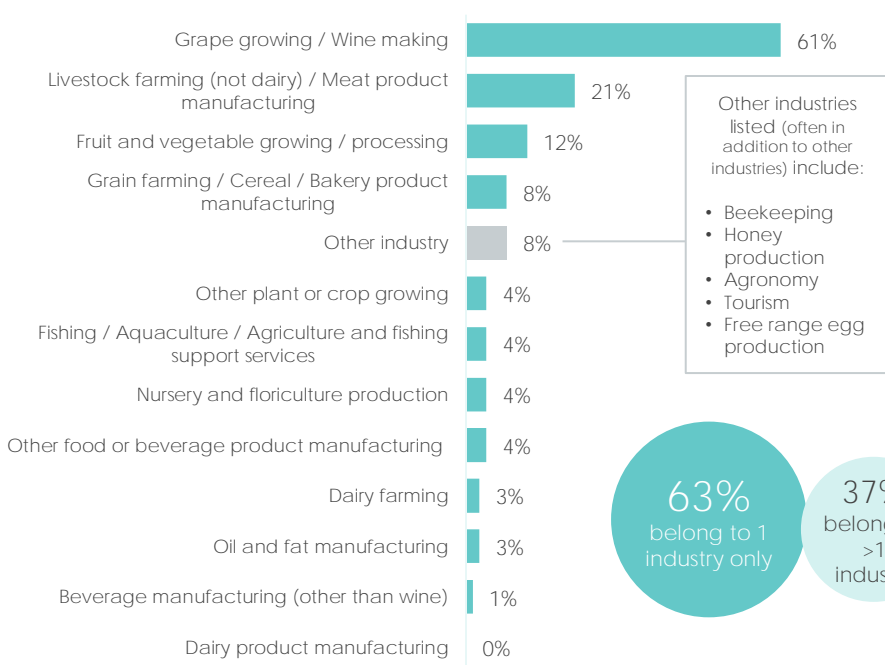
## KEY STAKEHOLDER PERSPECTIVES

PRIMARY PRODUCERS / FOOD MANUFACTURERS  
NON-PRIMARY PRODUCERS / NON-FOOD MANUFACTURERS  
ORGANISATIONS REPRESENTING PRIMARY PRODUCERS / FOOD MANUFACTURERS

# Snapshot of key stakeholder survey respondents

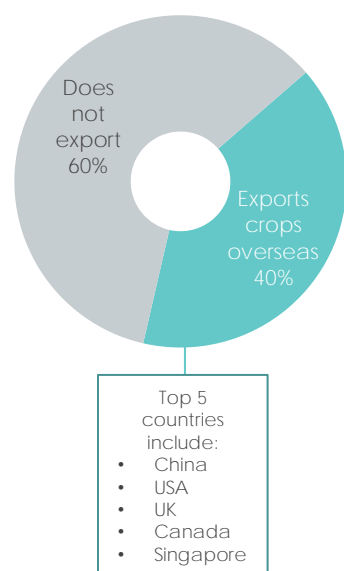


FIGURE 1. INDUSTRY GROUP DISTRIBUTION



Q. In which industry is your business? (PPs / FMs only)  
Note: Industry groups are not mutually exclusive

FIGURE 2. EXPORT STATUS



Q. Do you export any of your crop(s)/product(s) overseas? Please list the countries you export to.

TABLE 1. ASSOCIATION & MEMBER DETAILS

Association name	Association size	Industry groups that best represent members
Green Light Organic Market Willunga	18 members	Fruit and Nut growing, Mushroom and Vegetable Growing Fruit and Vegetable Processing, Other Plant or Crop Growing, Nursery and Floriculture Production, Oil and Fat Manufacturing, Other industry groups in the Food and Beverage Manufacturing sector (honey, tea, miscellaneous foods)
Friends of Organic and Regenerative Farmers SA	120 members	Aquaculture, Agriculture & Fishing Support Services, Dairy Farming, Dairy Product Manufacturing, Livestock Farming, Grain Farming, Grape Growing, Wine Making, Other Beverage Manufacturing, Mushroom and Vegetable Growing, Fruit and Vegetable Processing, Nursery and Floriculture Production

Q. Which industry/industries best represents your members? Q. How many members does your association or incorporation have?  
Note: Two organisations indicated they would prefer for their responses to remain anonymous.

Base: PPs / FMs n=75; Orgs rep PPs / FMs n=4; Other bus in the City (not PPs / FMs) n=9

\* Caution: Small base sizes less than 30

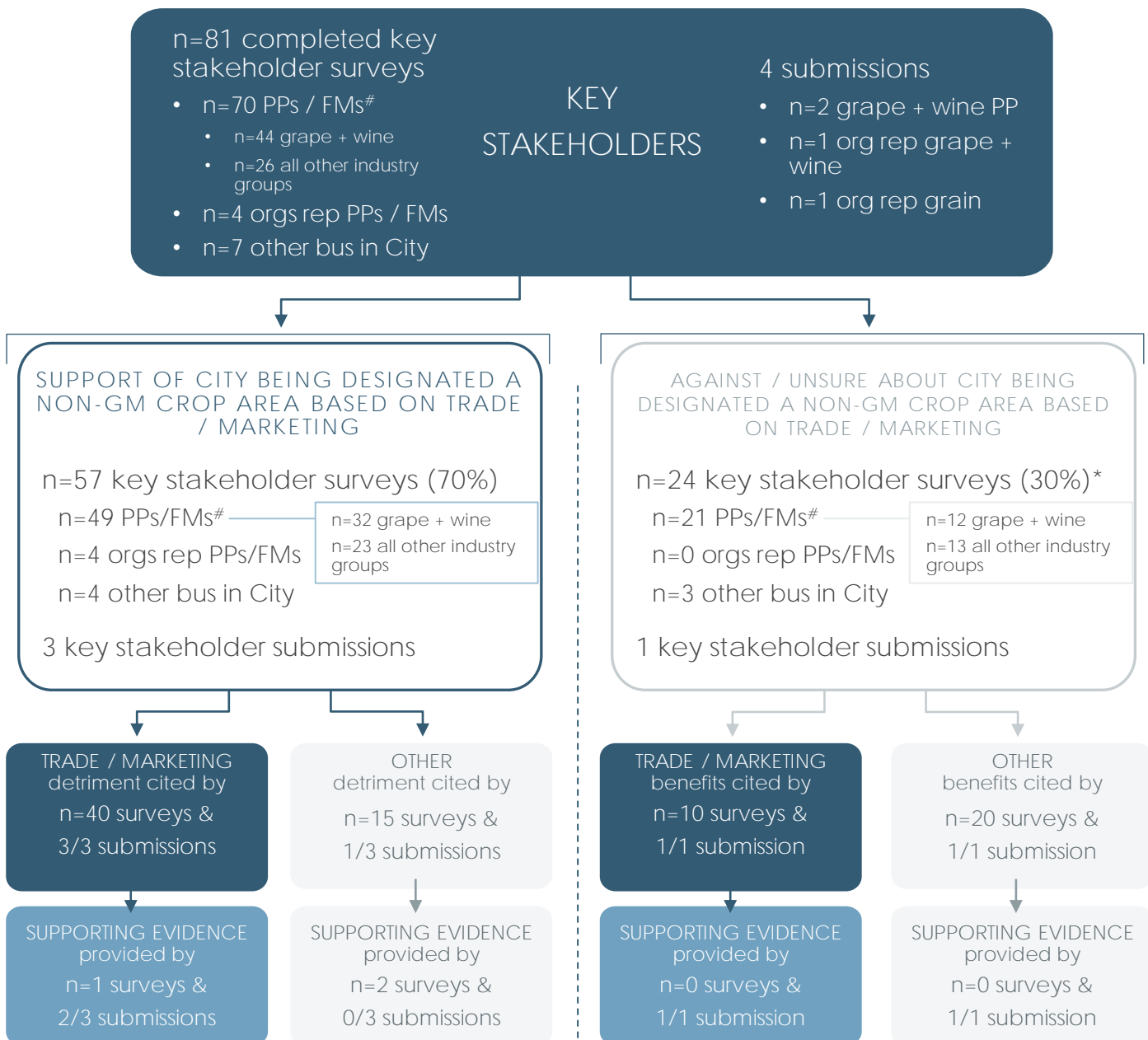
\*\* Caution: Very small base sizes less than 10 (raw base sizes have been presented for these cases)

# Summary of key stakeholders' GM position

In total, n=81 key stakeholders responded to the survey and four provided written submissions to council. Overall, 70% of key stakeholders are in support of designating the City of Onkaparinga a non-GM crop area.

Of those in support of making the region a non-GM crop area, nearly three quarters of the supporters cited detriment to trade and marketing as reasons underpinning this. Of those in favour of GM cropping, two in five cited trade and marketing benefits.

FIGURE 3. SUMMARY OF KEY STAKEHOLDER ENGAGEMENT FINDINGS



Base: PPs / FMs n=70: Orgs rep PPs / FMs n=4: Other bus in the City (not PPs / FMs) n=7

# Note: Business respondents in the survey were able to select more than one industry group

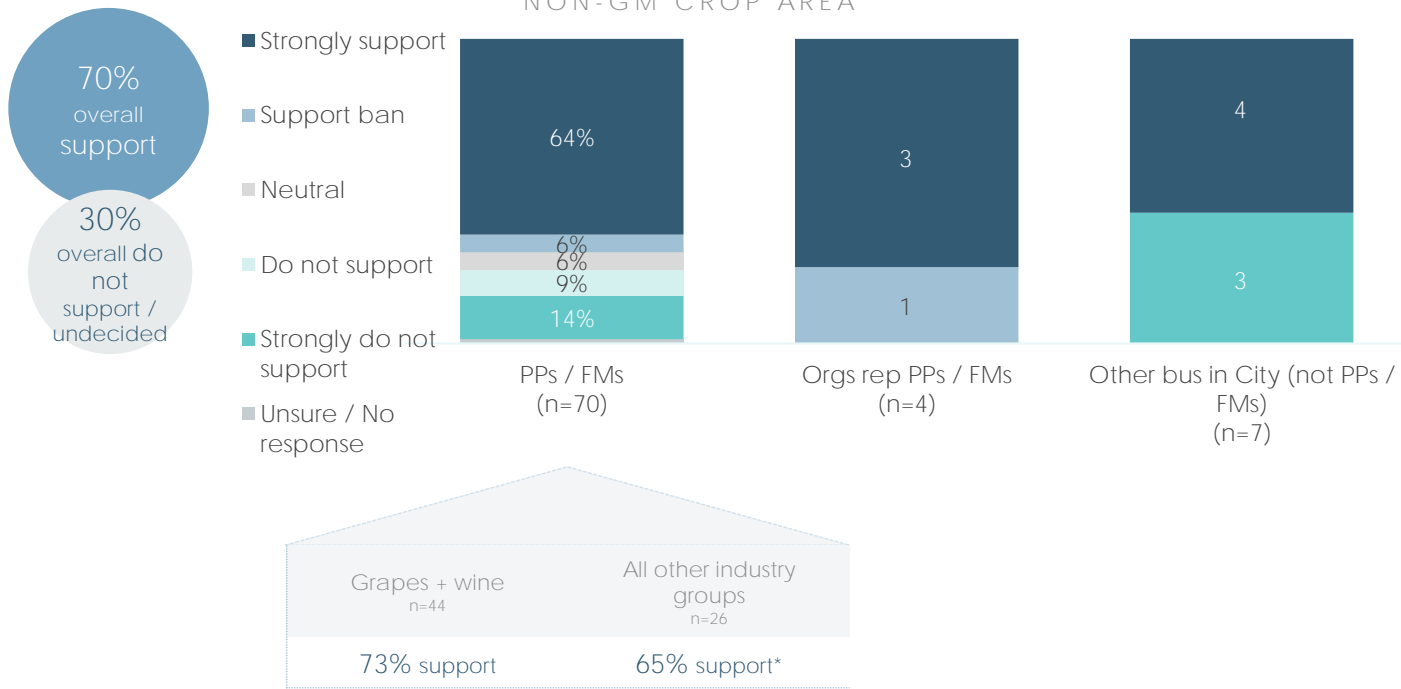
\* Caution: Small base sizes less than 30

\*\* Caution: Very small base sizes less than 10 (raw base sizes have been presented for these cases)

# Key stakeholders' GM position

Overall, 70% of key stakeholders gave support (64% strong support) for the Council applying to the Minister to designate the City of Onkaparinga as a region free of GM crops. This compares to 23% in favour of GM crops, and 6% neutral or unsure. There appears to be slightly more support among the grape growing and wine making industry groups, and less support (and more uncertainty) among all other industry groups.

FIGURE 4. KEY STAKEHOLDERS' POSITIONS ON CITY BEING DESIGNATED A NON-GM CROP AREA



"We should promote natural, sustainable methods of food production in our region. this is an important brand issue." – Supports City as designated non-GM crop area

"The Fleurieu Peninsula has a reputation of producing top quality food. This reputation will be lost and all that are not using GM will lose business because of only a few GM farmers." – Supports City as designated non-GM crop area

"We have a reputation for some of the most excellent produce in the country, including the wine industry. Why potentially jeopardise this reputation?" – Supports City as designated non-GM crop area

"I believe that Australia's success as a primary producer and net exporter of food and grain is because we have utilized the successful research of our scientists. Genetic modified crops are already being grown in other states to the benefit of the growers and consumers. Banning these crops here will be detrimental to our growers, city and state." – Against City as designated non-GM crop area

"I think GM crops are great, we should lift the stupid ban in SA." – Against City as designated non-GM crop area

Q. Based only on trade and marketing implications, do you support council applying to the Minister for Primary Industries and Regional Development, asking that the City of Onkaparinga is designated as a non-GM crop area?

Base: Those who answered the question PPs / FMs n=70; Orgs rep PPs / FMs n=4; Other bus in the City (not PPs / FMs) n=7

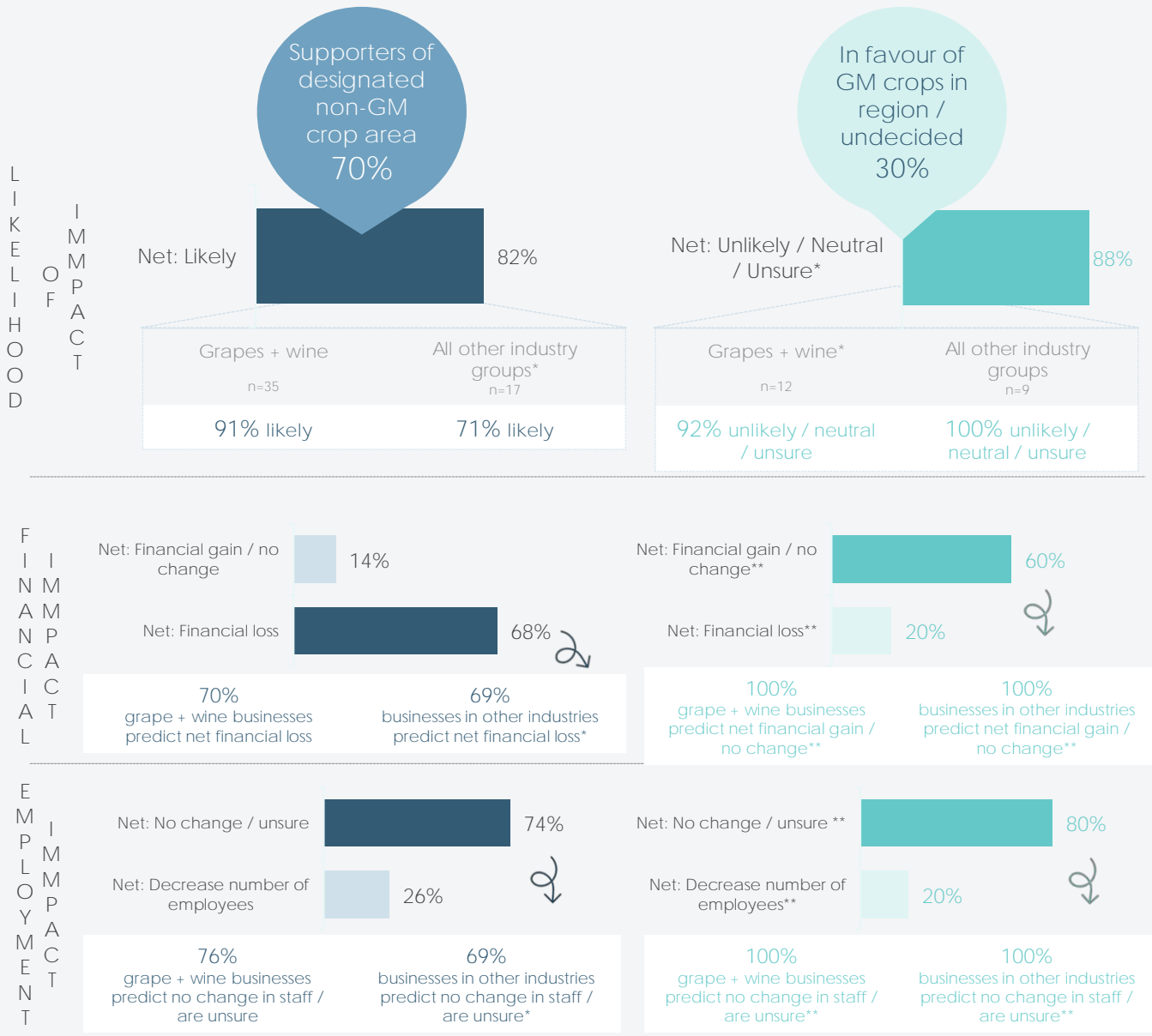
\* Caution: Small base sizes less than 30 \*\* Caution: Very small base sizes less than 10

# Perceived impacts of GM crops

Of the 70% of key stakeholders in support of designating the area free of GM crops, the majority overall perceive *likely impacts to trade and/or marketing* (82%); in the form of financial loss (68%) and loss of staff (26%).

In contrast, of the 30% in favour or undecided about GM cropping, the majority overall predict *low or no likelihood of trade and/or marketing impacts* (88%). (Caution when interpreting financial and staffing predictions as numbers are very small).

FIGURE 5. PERCEIVED TRADE / MARKETING IMPACTS OF ALLOWING GM CROPPING IN THE REGION



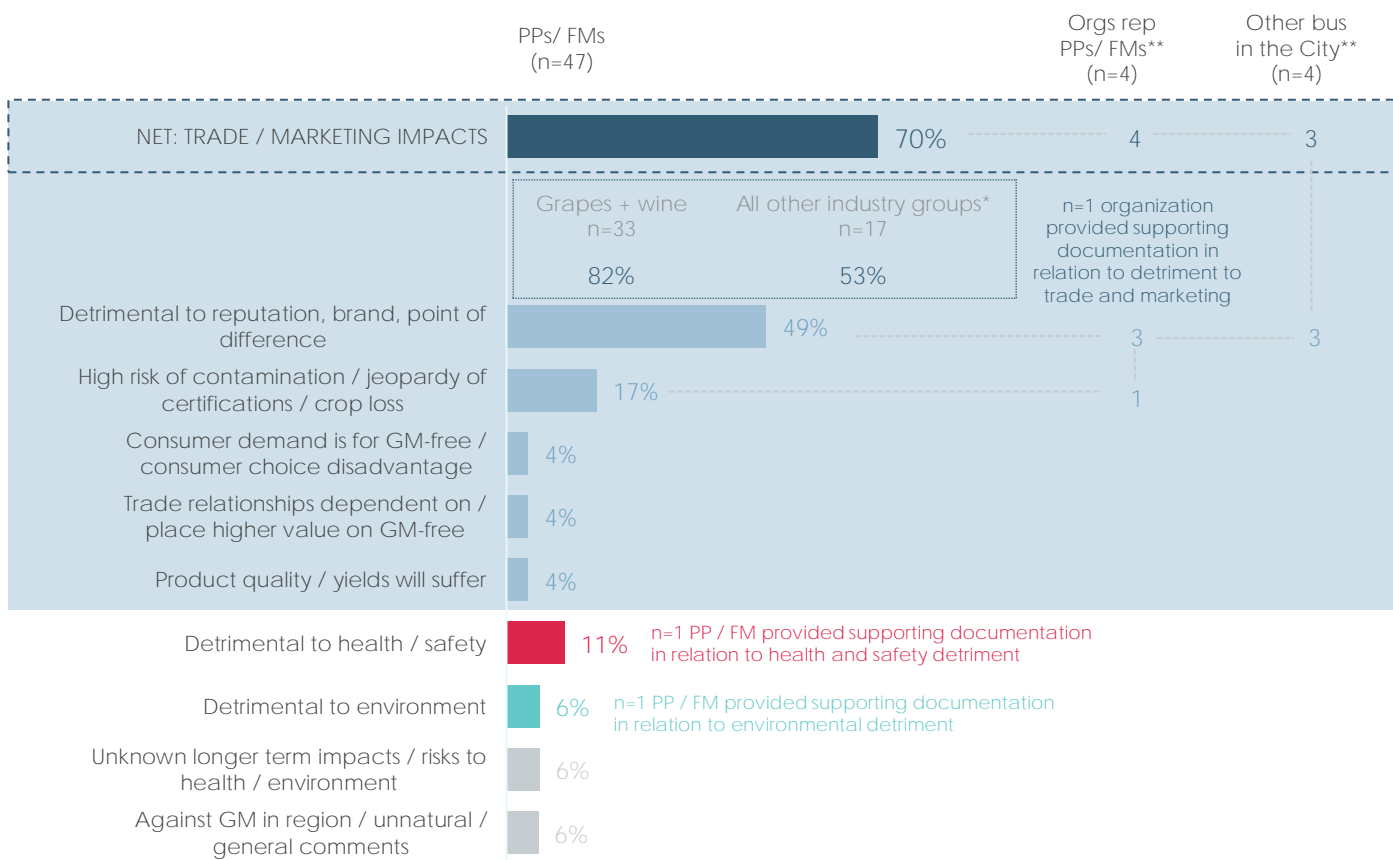
Q. How likely are there to be trade and marketing impacts on your business / members by genetically modified crops being allowed in the City of Onkaparinga? Base: PPs / FMs n=75; Orgs rep PPs / FMs n=4; Other bus in the City (not PPs / FMs) n=7  
 Q. What do you estimate the financial impact could be for your business / members? Q. Will genetically modified crops being allowed in the City of Onkaparinga have an impact on the number of people your business employs / for your members?  
 Base: Those in support of designating City as non-GM crop area: PPs / FMs n=49; Orgs rep PPs / FMs n=4; Other bus in the City (not PPs / FMs) n=4;  
 Base: Those in favour of allowing GM cropping in area: PPs / FMs n=21; Orgs rep PPs / FMs n=0; Other bus in the City (not PPs / FMs) n=3  
 \* Caution: Small base sizes less than 30 \*\* Caution: Very small base sizes less than 10 (raw base sizes have been presented for these cases)

# Reasons the region should be designated as a non-GM crop area

Seventy percent of primary producers' and food manufacturers' cited trade and marketing reasons to support their position of the region being designated a non-GM crop area. Four out of four organisations representing primary producers, and three out of four other businesses in the City also cited the risk to trade and marketing of allowing GM cropping in the area.

Three surveys contained attachments in support of their position (two primary producers / food manufacturers and one organisation representing primary producers / food manufacturers), however only the latter referred to potential trade and marketing impacts of allowing GM cropping. The survey attachment took the form of a submission referencing several documents, including third party submissions to the SA Government's Independent Review of the SA GM Food Crop Moratorium (from KI Pure Grain and Palsystem Consumers' Co-operative Union, showing export contracts, and stating price premiums available to non-GM products from KI), also critiquing this review. Also referenced was a 2013 paper 'No Appetite for Australian GM Wheat' (citing rejection for Australian GM wheat from export markets and Australian manufacturing companies), a 2011 Grain Growers report (stating demand and price premiums for non-GM grains and canola), a 2017 national consumer monitor (showing low levels of comfort among Australians with GM plants and animals for food), and position papers from Coles and Woolworths in relation to GM and non-GM products.

FIGURE 6. REASONS IN SUPPORT OF CITY DESIGNATED AS A NON-GM CROP AREA



Q. Please explain why...[you do not support council applying to the Minister for Primary Industries and Regional Development, asking that the City of Onkaparinga is designated as a non-GM crop area]

Base: Those in support of region being a designated non-GM crop area: PPs / FMs n=47; Orgs rep PPs / FMs n=4; Other bus in the City (not PPs / FMs) n=4

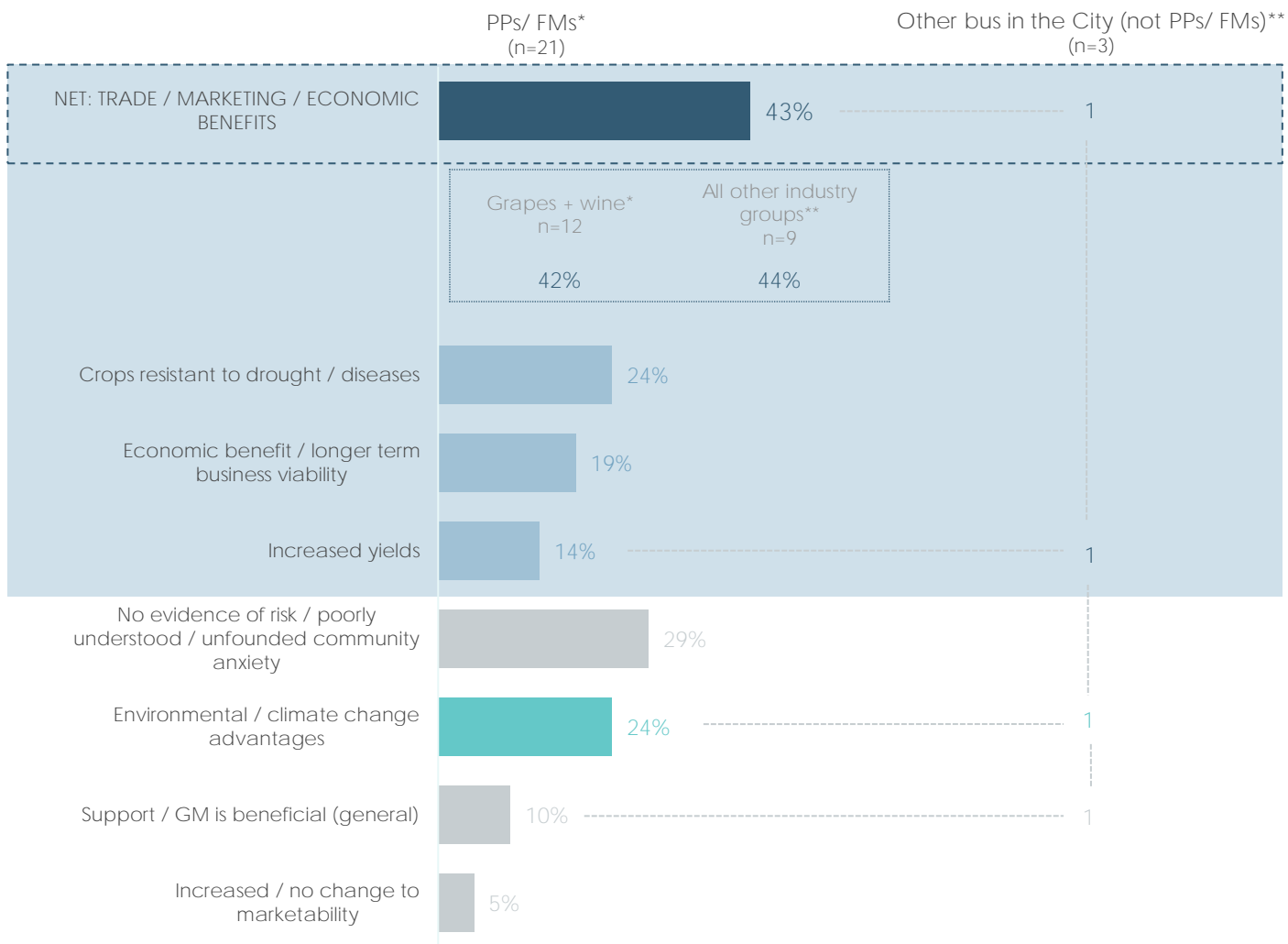
\* Caution: Small base sizes less than 30 \*\* Caution: Very small base sizes less than 10 (raw base sizes have been presented for these cases)

Note: Findings for PPs / FMs have been presented in chart form as the sample size enables this; other groups' findings have been shown with raw numbers

# Reasons the area should allow GM crops

Not surprisingly, reasons in favour of allowing GM crop growing in the region were the antithesis to reasons for designating the area as a non-GM crop area (however, caution must be exercised as numbers of responses were small). The largest proportion of primary producers and food manufacturers cited trade, marketing and economic benefits (43%), and the second largest proportion referred to a lack of evidence to substantiate risk, combined with community anxiety and poor understanding of genetic engineering and modification. The third largest proportion cited environmental advantages of GM cropping.

FIGURE 7. REASONS GIVEN IN FAVOUR OF GM CROPPING IN THE REGION



"In the future there are limitless advantages of GM modified crops, not just canola." – Against City as designated non-GM crop area

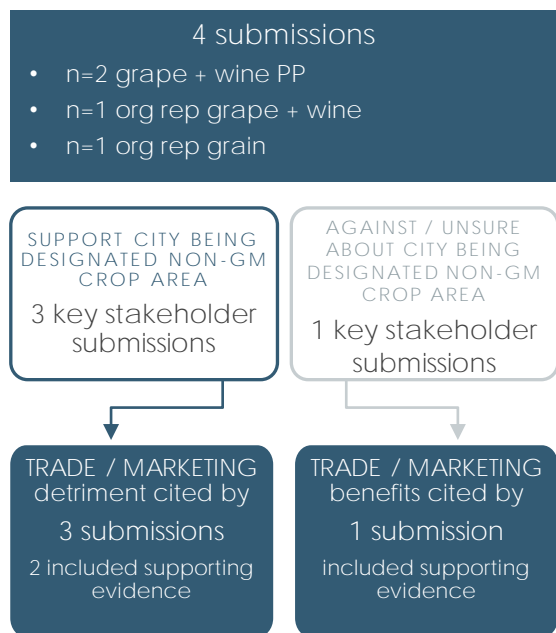
"As a agricultural scientist by training, I believe that the potential benefits to agriculture offered by wise use of GM technology are too important to stifle by Council taking an anti-GM stand." – Against City as designated non-GM crop area

Q. Please explain why...[you do not support council applying to the Minister for Primary Industries and Regional Development, asking that the City of Onkaparinga is designated as a non-GM crop area]  
 Base: Those against / neutral towards the region being a designated non-GM crop area/ unsure: PPs / FMs n=21; Orgs rep PPs / FMs n=0; Other bus in the City (not PPs / FMs) n=3  
 \* Caution: Small base sizes less than 30    \*\* Caution: Very small base sizes less than 10 (raw base sizes have been presented for these cases)  
 Note: Findings for PPs / FMs have been presented in chart form as the sample size enables this; other groups' findings have been shown with raw numbers

# Summary of key stakeholder submissions

Overall, four written submissions were received from key stakeholders (two from primary producers / food manufacturers; two from organisations representing primary producers / food manufacturers). Three submissions were comprehensive and included attachments / links to supporting evidence, and one was a concise email.

FIGURE 8. SUMMARY OF KEY STAKEHOLDERS' SUBMISSIONS



## Overall sentiment and GM position

Three of the four key stakeholder submissions were in favour of the region being made a designated non-GM crop area, whereas one key stakeholder was in favour of allowing GM crops in the region.

## Evidence provided

Impacts to trade / marketing and financial impact were reasons cited by all three key stakeholders who supported the City to be a designated non-GM crop area; two provided supporting information. However, no region-specific information was provided (e.g. contracts or studies in the region).

There was overlap in the evidence provided, with all submissions referencing the 2019 Independent Review of the SA GM Food Crop Moratorium.

The submission in favour of allowing GM crops in the region referenced a second recent review (in addition to the aforementioned Independent Review), conducted in 2017. Overall, the submission in favour of allowing GM crops discussed:

- A lack of evidence showing any price increases for a key GM crop;
- Evidence of increased crop yields for GM crops;
- The cost benefit of less chemical use on GM crops;
- Significant cost to a key primary industry in the region as a result of the moratorium.

Trade and marketing evidence provided to support the region being designated a non-GM crop area largely drew on Kangaroo Island and Tasmania as examples of precedents to support the following points:

- Decreased sales of premium non-GM products due to price competition of GM canola, projected loss of future export markets whose trade relationships are reliant on GM-free agreements, loss of consumer confidence / negative (based on global consumer sentiment);
- Cross-contamination of non-GM crops in region, resulting in jeopardy of organic / biodynamic certifications, complexity and cost to the traceability and labelling requirements; higher potential of litigation between GM producers;
- Loss of brand equity, reputation and premium marketing opportunities for non-GM due to lack of differentiation with commonly grown GM-crops, cross-contamination risks and loss of whole region as 'clean and green' / non-GM.

# SECONDARY STAKEHOLDER PERSPECTIVES

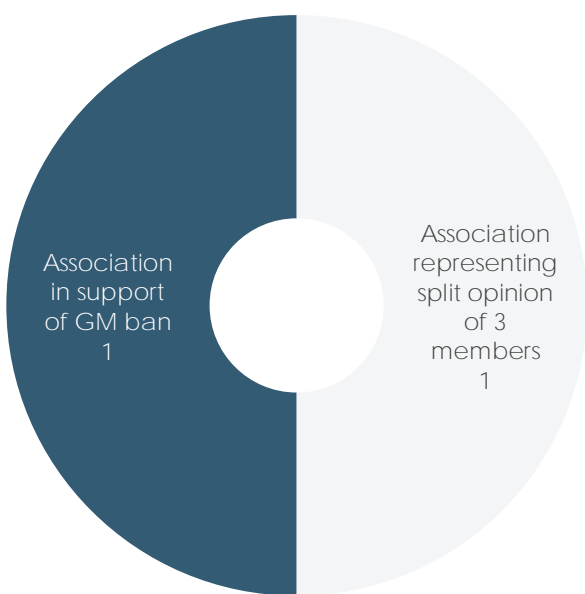
BUSINESS & TOURISM ASSOCIATIONS

# Secondary stakeholders' GM position

Two Business & Tourism Associations commenced the survey, one representing a member base of less than 10 members, the other a member base of more than 200 members. While only one organisation completed the survey, the other chose to submit a written response in the form of a concise letter (no supporting evidence supplied) on behalf of three member submissions. The low number of responses from this stakeholder group makes any comprehensive analysis difficult.

The Reynella Business and Tourism Association Inc completed a survey indicating they support designating the City a non-GM crop area. The McLaren Vale Business and Tourism Association provided a concise written submission on behalf of two of their members, also in support of this. These two members suggested that designating McLaren Vale and / or the Fleurieu as non-GM crop areas would be a significant marketing opportunity for the region.

FIGURE 9. POSITION ON GM OF SURVEY RESPONDENT & SUBMISSION

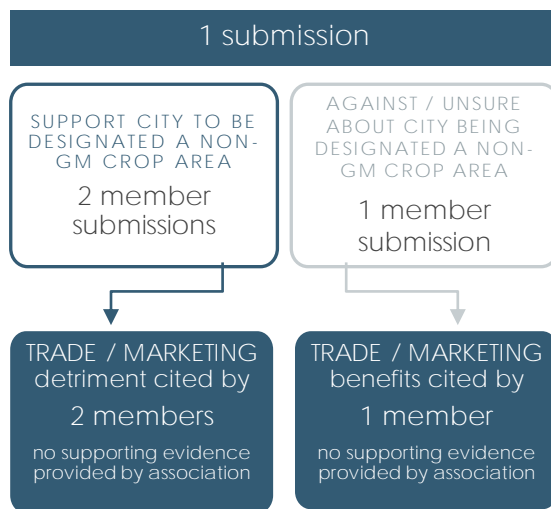


"Not good for human health, environment or a true representation of the roles the Onkaparinga council are doing for the ratepayers." – Supports City as designated non-GM crop area

The member response in favour of the region allowing GM crops to be grown (delivered via the McLaren Vale Business and Tourism Association), was on the basis of allowing business access to new GM varieties of fruit and nut trees and the choice to trade these. This member estimated consumer rejection of less than 5%. No additional supporting information was provided by either organisation.

"It allows our business access to new GM varieties of fruit and nut trees." – Against City as designated non-GM crop area

FIGURE 10. SECONDARY STAKEHOLDER SUBMISSION



"Keeping McLaren Vale and /or the Fleurieu GM free would be a significant marketing opportunity for the region." – Supports City as designated non-GM crop area

## OTHER STAKEHOLDER PERSPECTIVES

BUSINESSES OUTSIDE OF THE CITY  
COMMUNITY MEMBERS IN THE CITY (RESIDENTS)  
GENERAL PUBLIC LIVING OUTSIDE OF THE CITY (WORKERS / INVESTMENT PROPERTY  
OWNERS / VISITORS)

# Snapshot of other stakeholder survey respondents

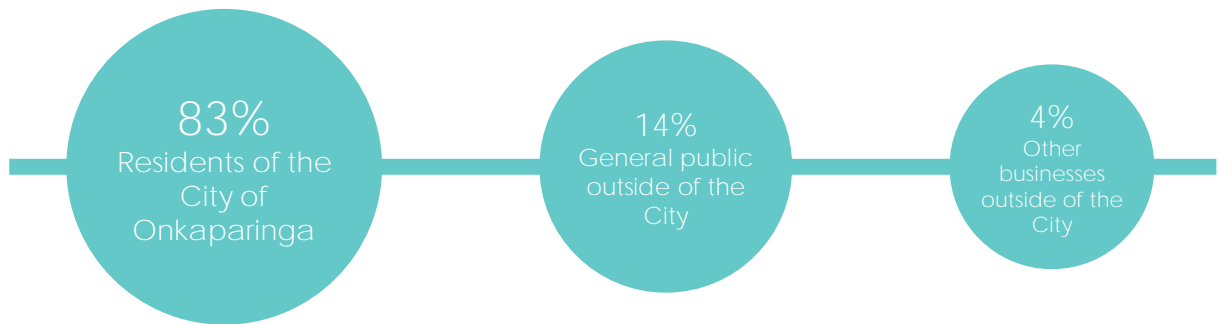
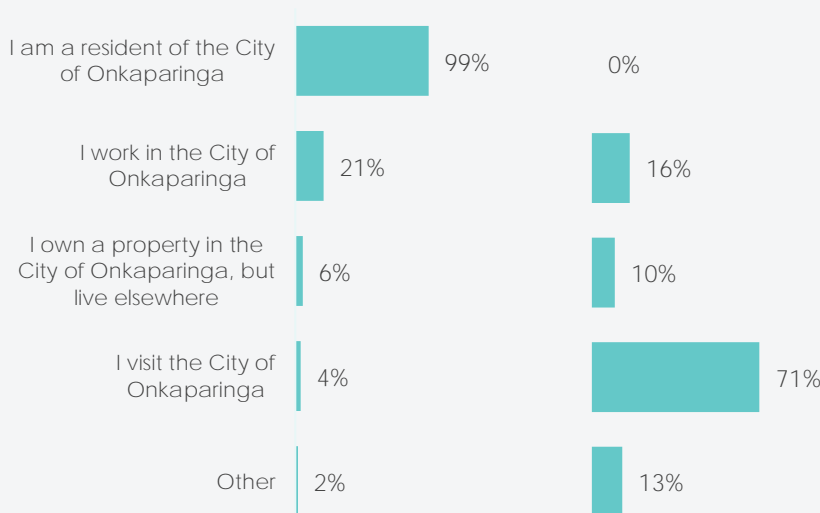


FIGURE 11. LINK TO CITY OF ONKAPARINGA



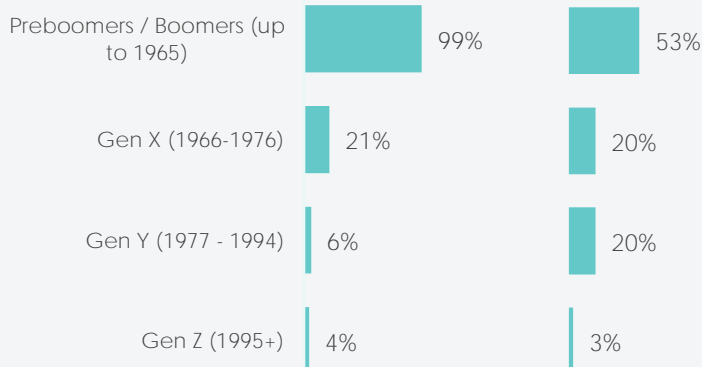
Q. What is your link to the City of Onkaparinga? (Residents: General public)

Business industry group\*\*

Grain farming / cereal / bakery product manufacturing	4
Grape growing / wine making	3
Livestock farming (non dairy) / Meat manufacturing	2
Fruit & vegetable growing / processing	2
Other industry	2
Fishing / Aquaculture & support services	1
Other plant / crop growing	1
Nursery / Floriculture production	1
Other food / beverage product manufacturing	1
Specialised food / beverage retailing	1

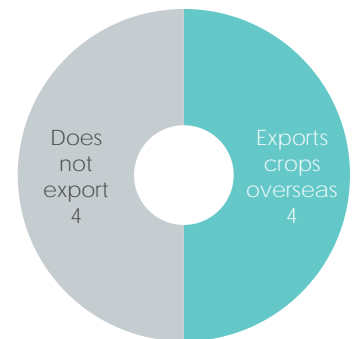
Q. In which industry is your business?

FIGURE 12. GENERATIONS OF THE GENERAL COMMUNITY



Q. What year were you born? (Residents: General public)

FIGURE 13. EXPORT STATUS OF OTHER BUSINESSES OUTSIDE OF CITY\*\*



Q. Do you export any of your crop(s)/product(s) overseas?

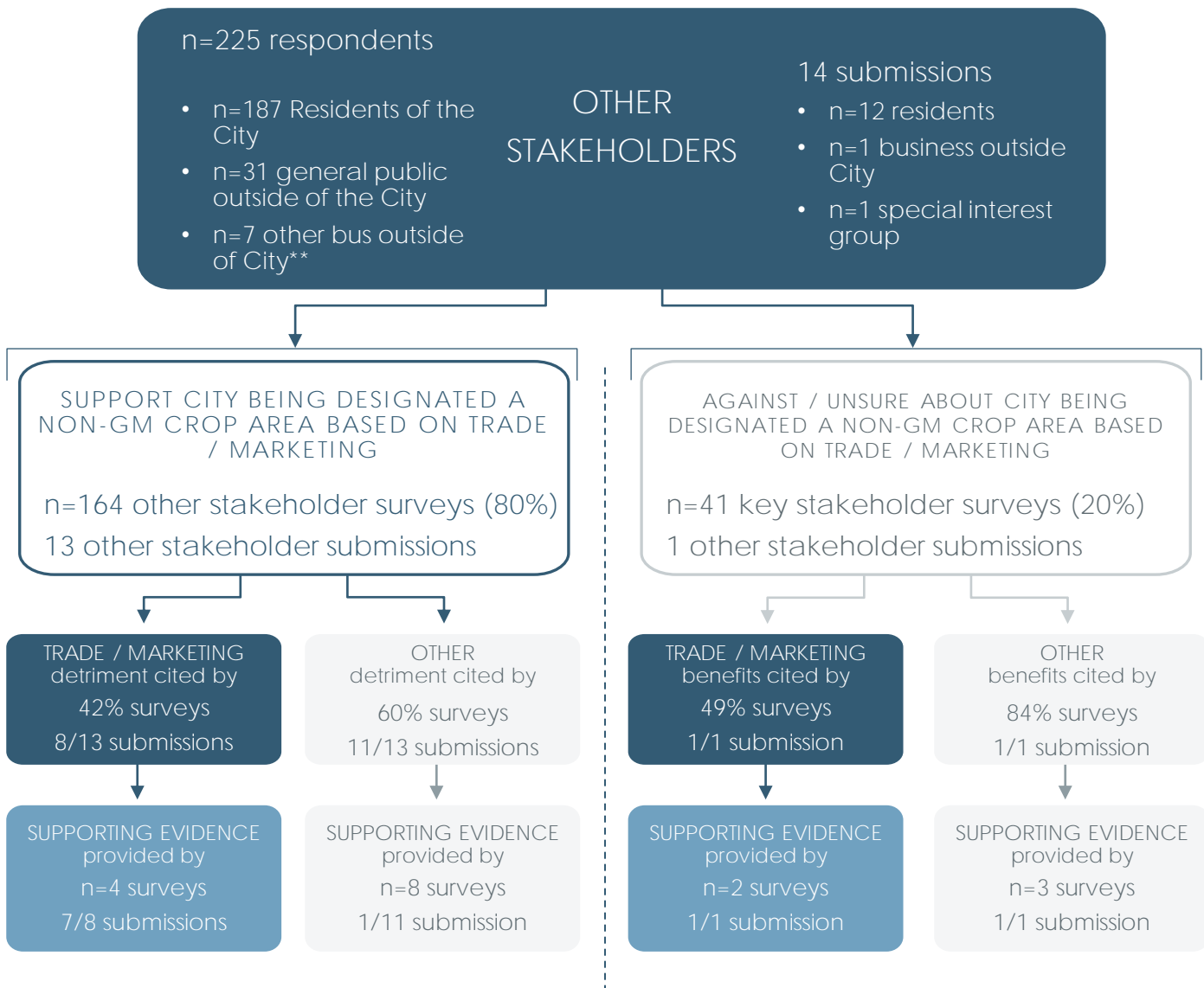
Base: Residents n=187; Gen pub n=31; Other bus n=7

\* Caution: Small base sizes less than 30 \*\* Caution: Very small base sizes less than 10 (raw base sizes have been presented for these cases)

# Summary of the general community's GM position

Overall, 80% and 13 of 14 submissions from the general community support making the City of Onkaparinga a designated non-GM crop area. Of the supporters, 42% cited trade and marketing reasons underpinning this, and 60% cited other reasons (including risks to health and the environment). Of the 20% in favour of allowing GM crops to be grown in the region, half cited trade and marketing benefits of GM cropping, and 84% discussed other benefits and a lack of evidence suggesting GM crops are unsafe.

FIGURE 14. SUMMARY OF OTHER STAKEHOLDER ENGAGEMENT FINDINGS



Base: Residents n=187; Gen pub n=31; Other bus n=7

\* Caution: Small base sizes less than 30

\*\* Caution: Very small base sizes less than 10 (raw base sizes have been presented for these cases)

# General community's GM position

Overall, 80% of the general community gave support (78% strong support) for designating the City of Onkaparinga a non-GM crop area. A similar proportion (83%) reported they always or sometimes select GM-free foods based on labelling. In contrast, 16% were in favour of growing GM crops in the region (4% felt neutrally or were unsure), and 17% report not purchasing foods based on their GM status.

FIGURE 15. GENERAL COMMUNITY'S POSITIONS ON CITY BEING DESIGNATED A NON-GM CROP AREA

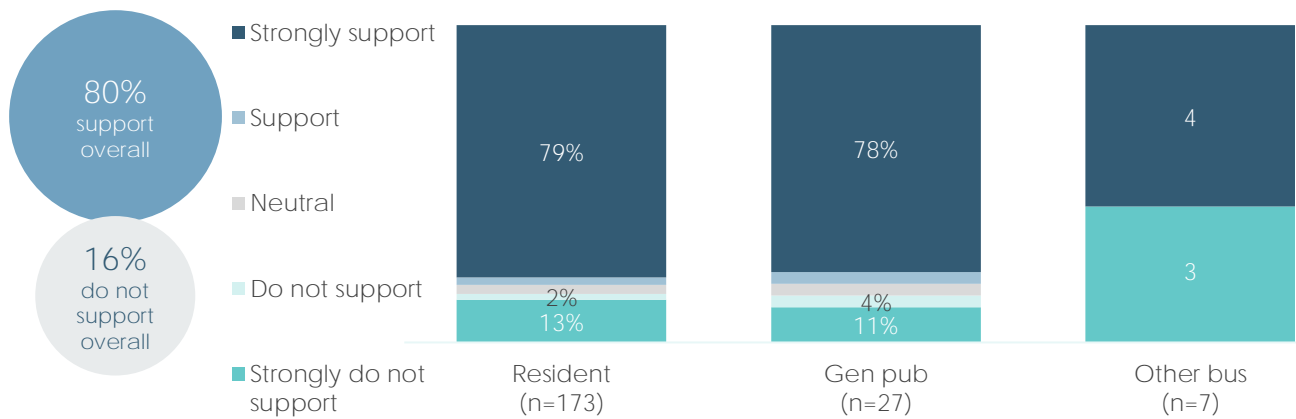
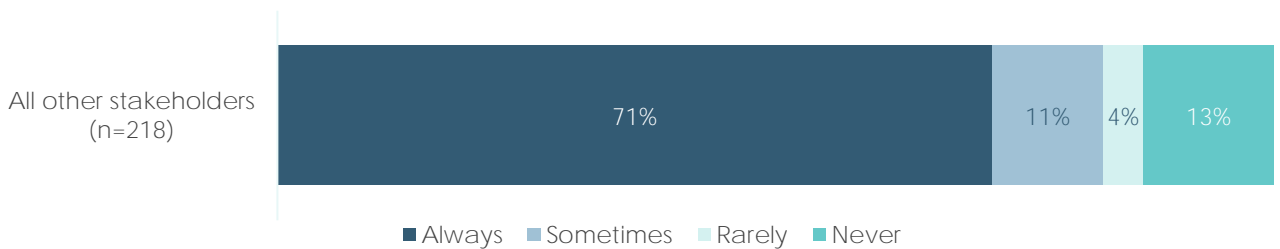


FIGURE 16. GENERAL COMMUNITY'S PRODUCT SELECTION BEHAVIOURS



"The primary producers on the Fleurieu Peninsula produce some of the most sought after and quality food in the world - artisan cheeses, honeys, meat and dairy. These farmers and businesses rely on their status as clean and green to get top dollar for their produce, many are certified organic. The Farmers Markets on the Fleurieu are visited by people from far and wide, who are looking for food that is not tainted by the possibility of GM cross pollination from neighbouring businesses. To introduce GM crops to the Fleurieu would be detrimental to their farming business model. We should be preserving our niche food markets in South Australia, not only on Kangaroo Island. Keeping the Fleurieu products uniquely positioned as non-GM makes marketing sense. It would be short-sighted to change this." – Supports City as a designated non-GM crop area

"GM crops are our future to feeding everyone and economic prosperity." – Against City as a designated non-GM crop area

"GM crops are much more strictly tested than conventional crops, and they are safer for the environment and human consumption." – Against City as a designated non-GM crop area

"This is pandering to the fear mongers. GM modified crops assist primary producers to provide better quality and or quantity of food and fibre and will result in an improved GDP for the region. In addition even if Onkaparinga becomes GM free this would in all expectation be extremely difficult and costly to administer." – Against City as a designated non-GM crop area

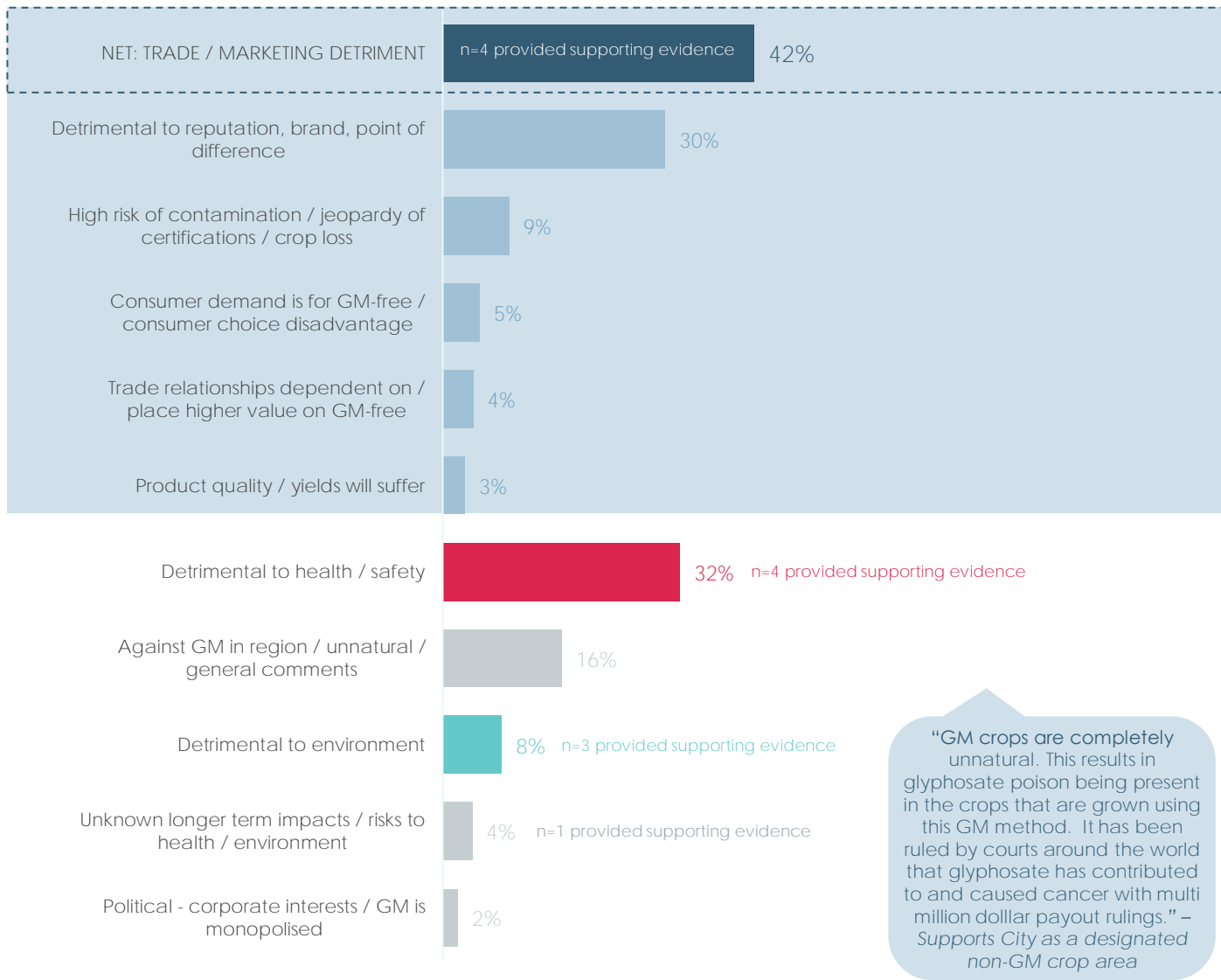
Q. Based only on trade and marketing implications, do you support council applying to the Minister for Primary Industries and Regional Development, asking that the City of Onkaparinga is designated as a non-GM crop area? Base: Residents n=172; Gen pub n=27; Other bus n=6  
 Q. How often do you choose products based on them being labelled as GM free? Base: Residents n=186; Gen pub n=31; Other bus NA

# Reasons the City should be GM crop-free

Reasons underpinning support of the region as a designated GM crop-free area were predominantly related to detriment to trade and marketing (42%). Four respondents provided supporting evidence in the form of media articles (three citing consumer preferences for non-GM foods – European and USA based studies; one citing the cross-contamination legal case in WA).

Remaining comments centred around concerns over health and safety, detriment to the environment, and unknown risks due to a lack of time or knowledge in this space to date. Eight respondents attached evidence – a range of research articles and media commentary from NZ, USA and UK, documenting risks to animal health from eating GM feed, human health from pesticides (claimed to be used on GM crops) and environmental detriment.

FIGURE 17. REASONS IN SUPPORT OF CITY AS DESIGNATED NON-GM CROP AREA



Q. Please explain why...[you do not support council applying to the Minister for Primary Industries and Regional Development, asking that the City of Onkaparinga is designated as a non-GM crop area]

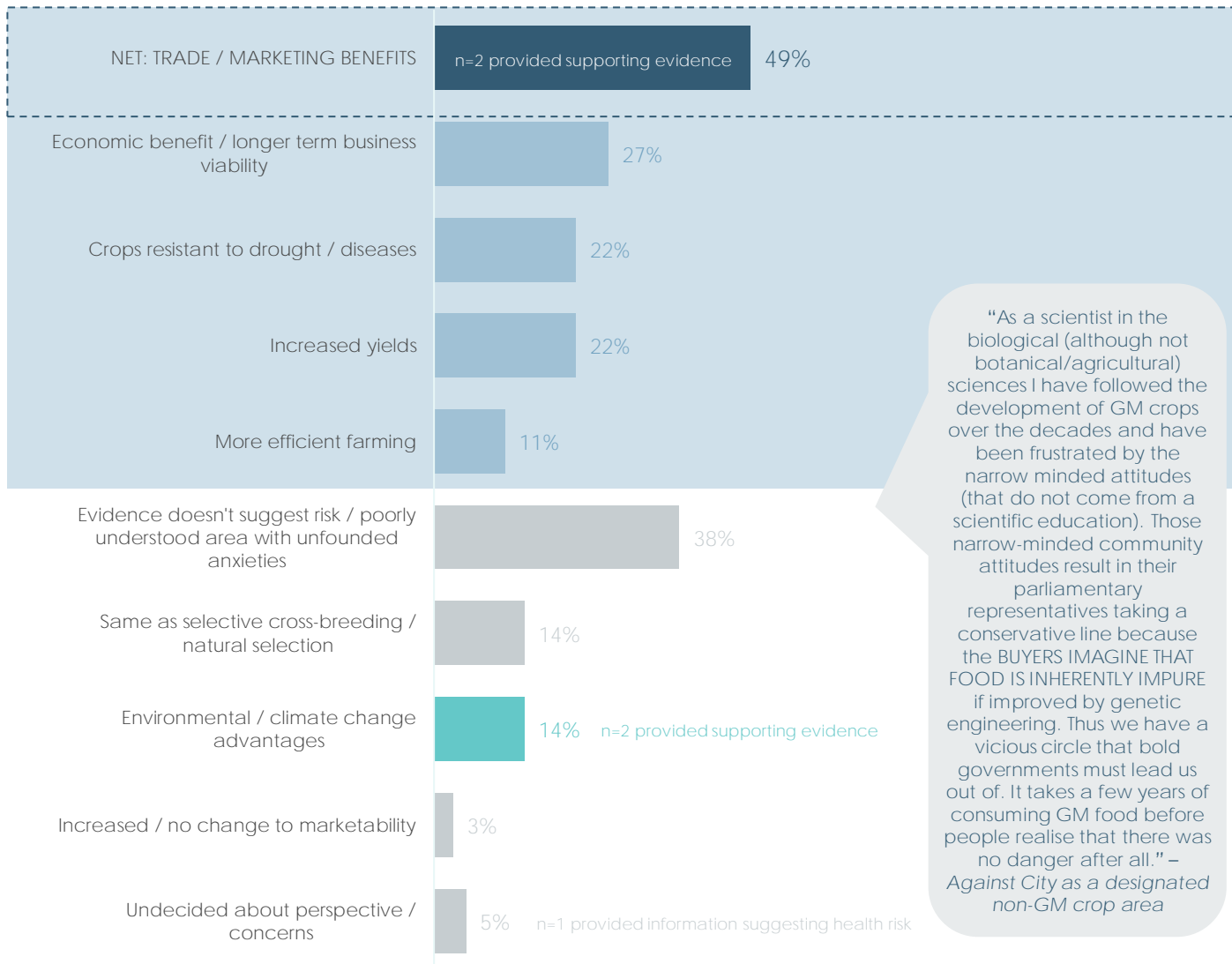
Base: Those in support of designated non-GM crop area / unsure: the general community n=158

# Reasons the City should allow GM crops

Reasons in favour of allowing GM crops in the region largely related to trade, marketing and economic benefits (49%), with two respondents providing supporting evidence the 2017 analysis of price premiums under the SA GM Moratorium, and a 2014 meta-analysis of the agronomic and economic impacts of GM crops). The second largest proportion of the general community in favour of allowing GM crops to be grown in the region referred to a lack of evidence to substantiate risk.

Two respondents provided evidence demonstrating environmental benefits of GM cropping (one a large scale committee review of GM crops conducted in 2016 in the USA, and the aforementioned meta-analysis). One respondent uncertain of their position on GM provided a USA/UK scientific study from 2007 showing a possible link between GM foods and the increase in food allergies.

FIGURE 18. REASONS GIVEN IN FAVOUR OF GM CROPPING IN THE REGION



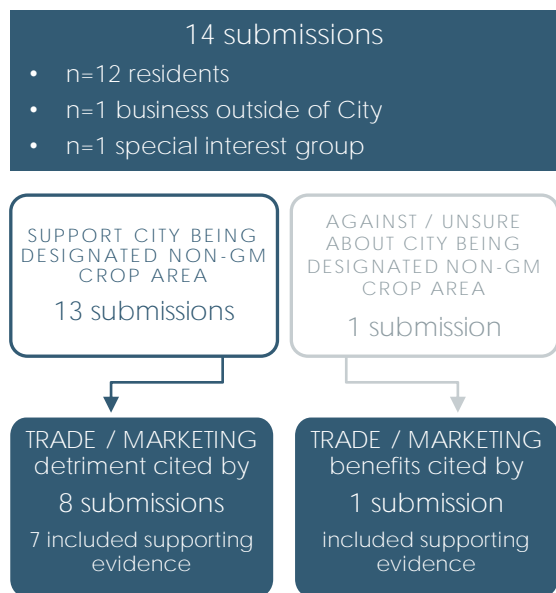
"As a scientist in the biological (although not botanical/agricultural) sciences I have followed the development of GM crops over the decades and have been frustrated by the narrow minded attitudes (that do not come from a scientific education). Those narrow-minded community attitudes result in their parliamentary representatives taking a conservative line because the BUYERS IMAGINE THAT FOOD IS INHERENTLY IMPURE if improved by genetic engineering. Thus we have a vicious circle that bold governments must lead us out of. It takes a few years of consuming GM food before people realise that there was no danger after all." – *Against City as a designated non-GM crop area*

Q. Please explain why...[you do not support council applying to the Minister for Primary Industries and Regional Development, asking that the City of Onkaparinga is designated as a non-GM crop area]  
 Base: the general community against / neutral towards City as a designated non-GM crop area / unsure n=36

# Summary of other stakeholder submissions

Overall, 14 written submissions were received from the general community (as well as a further 27 submissions supporting the region as a designated a non-GM crop area that used a template). Submissions varied in format and level of detail: nine were a mix of shorter emailed or handwritten letters, five were comprehensive, and seven cited supporting evidence via quotes, references, links and attachments.

FIGURE 19. SUMMARY OF GENERAL COMMUNITY SUBMISSIONS



## Overall sentiment and GM position

The general community who provided written submissions were also overwhelmingly in favour of the City of Onkaparinga being designated as a non-GM crop area.

## Evidence provided

Of the thirteen stakeholder submissions in support of the City to be designated a non-GM crop area, eight cited trade and marketing impacts of GM produce in the region; seven of whom provided supporting evidence.

Similarly, the single submission in support of GM crop growing in the area also cited trade and marketing benefits; providing supporting evidence.

Environmental impact of GM crops was also a concern raised in the submissions, mainly in community submissions as either stand alone reasons or in addition to business impacts.

The submission in favour of allowing GM crop growing in the region cited trade and marketing reasons, referencing the Independent Review of the South Australian GM Food Crop Moratorium, including:

- Market acceptance and viability for GM crops;
- Economic return from GM crops – from disease and drought resistance, increased yields;
- Increasing research and technology to improve GM crops to contribute to food security.

While many of the general community in favour of designating the City of Onkaparinga a non-GM crop area cited health and environment factors and provided evidence here also, the six who provided evidence to demonstrate trade and marketing impacts supplied a range of information (some community members provided vast amounts of documentation in their submissions).

Collectively, the trade and marketing evidence supplied included a study from the University of Adelaide Centre for Global Food and Resources (2016), several consumer studies – one global (including Australian respondents), one with Australian consumers, and one with Asian consumers showing varying support and comfort with eating GM foods, PIRSA industry information,

the Tasmanian Government's Review of Tasmania's genetically modified organisms (GMO) Moratorium, media articles from the USA, quotes from CSIRO scientists and economists, and written submissions from KI Pure Grain and PALsystem to other engagements.

The following main points were raised:

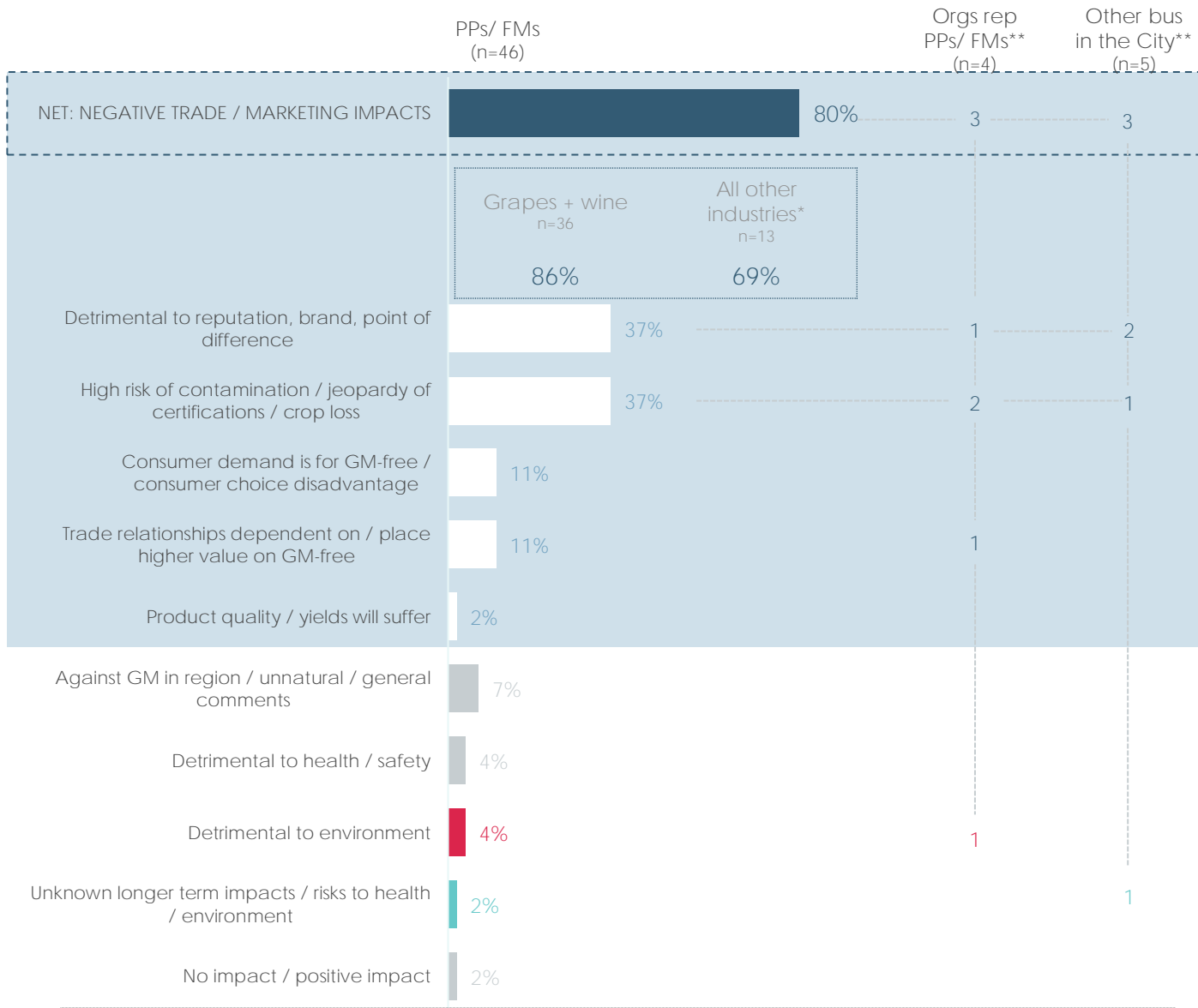
- Detriment to the region's image and reputation as organic, clean and green, and therefore disadvantage to primary producers in the region who differentiate based on these factors;
- The designated non-GM crop regions of Kangaroo Island and Tasmania were cited as precedents by some as an example of regions that have made strong financial gains due to retaining their non-GM crop status, using this as a marketing advantage.

## APPENDIX A: ADDITIONAL STAKEHOLDER FEEDBACK

# How allowing GM cropping will impact the region

Eighty percent of primary producers and food manufacturers perceive trade and marketing detriment, while only 2% (one business in the meat industry) estimate no impact or a positive impact. Detriment to the point of difference and reputation of the region and the risk of cross-contamination were the main trade / marketing concerns of primary producers and food manufacturers.

FIGURE 20. TRADE / MARKETING IMPACTS CITED



"It will devalue our product and all the hard work I have done to become Organic and BioDynamically Certified."

"The allowance of gm in farming will damage the profitable niche markets for local organic producers."

"We have a reputation for some of the best produce in the country, including clean produce unaffected by gm crops."

Q. How will genetically modified crops being allowed in the City of Onkaparinga have an impact on the trade or marketing of your business?  
 Note: % and numbers represent respondents who mentioned each respective topic. Topics are not mutually exclusive and respondents may have mentioned more than one topic.  
 Base: Those who perceived likely / neutral trade / marketing impact and responded; PPs / FMs n=46; Orgs rep PPs / FMs n=4; Other bus in the City n=5  
 \* Caution: Small base sizes less than 30 \*\* Caution: Very small base sizes less than 10 (raw base sizes have been presented for these cases)  
 Note: Findings for PPs / FMs have been presented in chart form as the sample size enables this; other groups' findings have been shown with raw numbers

# Additional comments from key stakeholders

Overall, 50 key stakeholders provided additional comments in favour of designating the City a non-GM crop area – relating to health and safety, the environment, as well as reiterating trade and marketing impacts. Twenty-four gave additional comments in favour of allowing GM crops to be grown in the region, reiterating trade and marketing benefits, environmental benefits, and the lack of evidence to demonstrate risk.

FIGURE 21. ADDITIONAL KEY STAKEHOLDER REASONS FOR SUPPORTING CITY AS DESIGNATED NON-GM CROP AREA

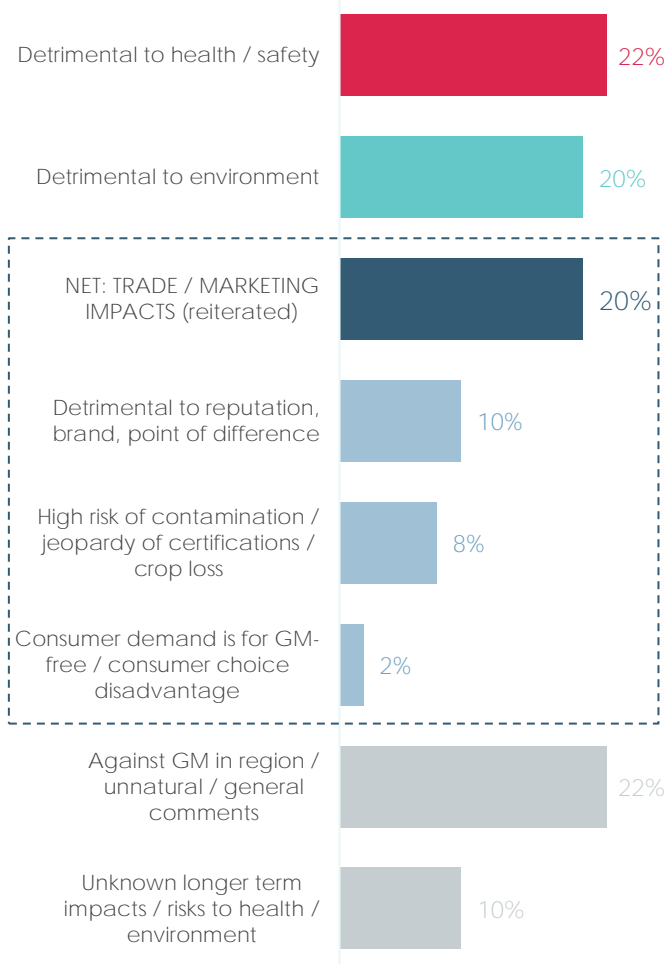
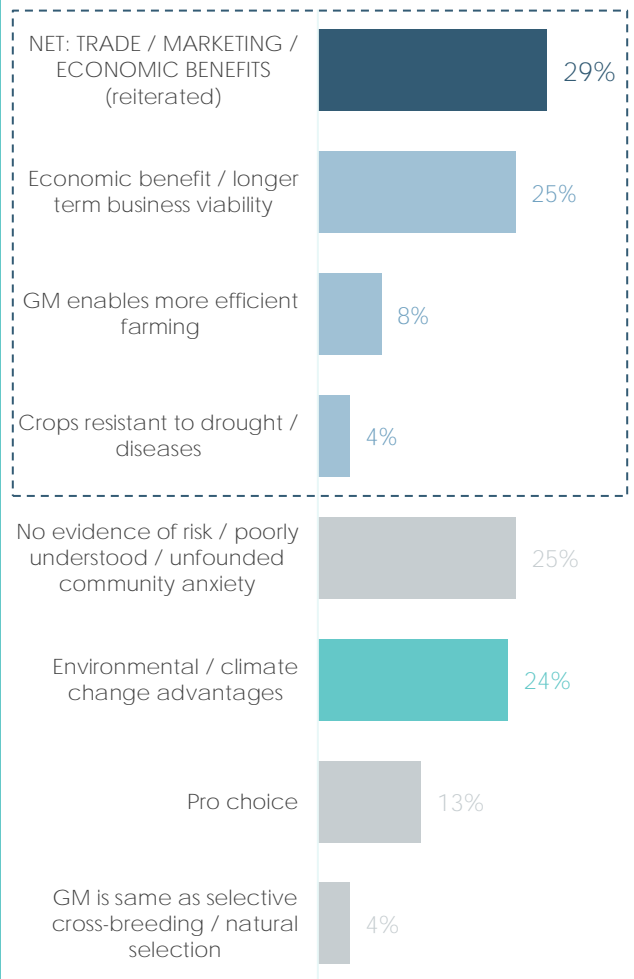


FIGURE 22. ADDITIONAL KEY STAKEHOLDER REASONS FOR ALLOWING GM CROP GROWING IN REGION\*



Q. Aside from the trade and marketing implications, do you have any other comments regarding genetically modified crops in the City of Onkaparinga?  
 Base: Key stakeholders in support of region as designated non-GM crop area n=50; key stakeholders in favour of allowing GM crop growing in region n=24  
 \* Caution: Small base sizes less than 30 \*\* Caution: Very small base sizes less than 10 (raw base sizes have been presented for these cases)

# Additional comments from the general community

Overall, 142 general community members provided additional comments in favour of making the City a designated GM-free crop region – again relating to health and safety, the environment, as well as reiterating trade and marketing impacts. Thirty-one gave additional comments in favour of growing GM crops in the region, reiterating trade and marketing benefits, general support for GM products and crop growing, and the lack of evidence to demonstrate risk.

FIGURE 23. ADDITIONAL OTHER STAKEHOLDER REASONS FOR SUPPORTING CITY AS DESIGNATED NON-GM CROP AREA

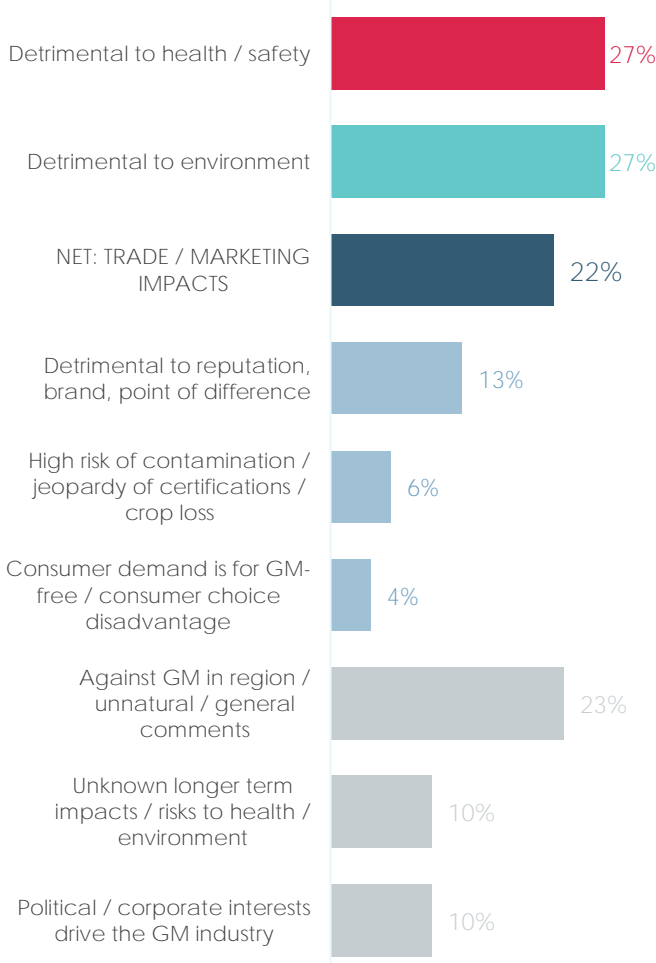
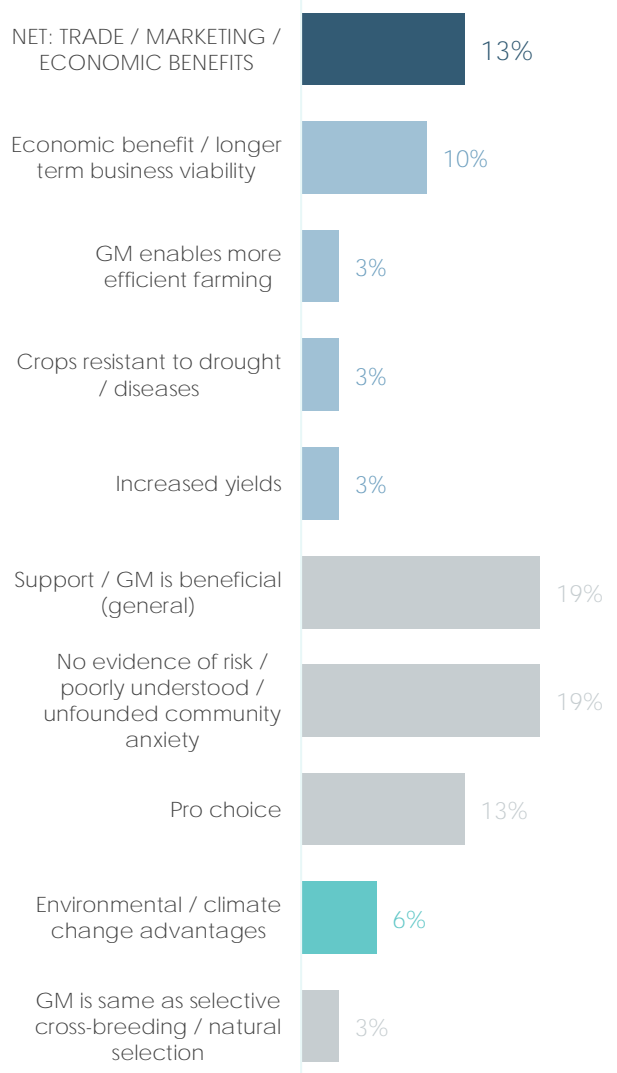


FIGURE 24. ADDITIONAL OTHER STAKEHOLDER REASONS FOR ALLOWING GM CROP GROWING IN REGION



Q. Aside from the trade and marketing implications, do you have any other comments regarding genetically modified crops in the City of Onkaparinga?  
 Base: the general community in support of region as designated GM-free n=142; the general community in favour of allowing GM crop growing in region n=31

## APPENDIX B: OVERVIEW OF BUSINESS STAKEHOLDERS & ORGANISATIONS REPRESENTING BUSINESSES

PRIMARY PRODUCERS / FOOD  
MANUFACTURERS

A A Magarey & Sons  
Angel Gully Vineyards  
Blewitt Springs Fine Eggs Pty Ltd  
Blue Cottage Farm  
Bukartilla Beef / Bukartilla Yabbies  
Capers on the Hill  
Coriole Vineyards  
Creek Block Wines Pty Ltd  
Damos Vineyard  
Fleurieu Honey  
FRW Pty Ltd  
Gemtree Wines  
Graeme S Hall  
Grape grower  
Hobby farm  
Hugh Hamilton Wines  
Jungle in Willunga  
Kanjo pty Ltd grape grower  
Linger Longer Vineyard  
Lower Tintara Vineyards  
M E Jacobs  
**McCarthy's Orchard**  
McMillan & Drew  
Oliver Nominees  
Paxton Wines  
Pelion East Vineyards  
RABrown  
RV and HA Schulz  
Southern Organic Almonds  
Stonycreek Vineyard  
T/A G F Amos  
The Madgetts Block  
The Old Chaff Mill vineyard  
Theo Eleftheriou  
Throon P/L  
Tuscany Hills, Curtis Family Vineyards  
Wigzell  
Wilcol  
Winter Creek Vines  
Yangarra Estate Vineyard  
  
A & K Wines – *written submission*  
Viticol – *written submission*

ORGANISATIONS REPRESENTING PRIMARY  
PRODUCERS / FARMERS MARKETS

Green Light Organic Market Willunga  
  
Friends of Organic and Regenerative Farmers SA  
  
McLaren Vale Grape, Wine and Tourism  
Association – *written submission*  
  
Grain Producers SA – *written submission*

OTHER BUSINESSES IN THE CITY (NOT PP / FM)

Botanista  
Argyl Riding Pony Stud

## APPENDIX C: QUESTIONS ASKED IN SURVEY

# Questions asked of businesses

## ASKED OF:

1. PRIMARY PRODUCERS & FOOD MANUFACTURERS (KEY STAKEHOLDERS)
2. OTHER BUSINESSES IN THE CITY (KEY STAKEHOLDERS)
3. OTHER BUSINESSES OUTSIDE OF THE CITY (THE GENERAL COMMUNITY)

Are you responding as a business owner/primary producer, an association or incorporation representing your members, or a community member?

What is the name of your business?

In which industry is your business?

What crop(s)/product(s) does your business produce/manufacture/retail/export?

Do you export any of your crop(s)/product(s) overseas? Please list the countries you export to

Is your business located in the City of Onkaparinga?

How likely are there to be trade and marketing impacts on your business by genetically modified crops being allowed in the City of Onkaparinga? (These impacts could be positive or negative.)

How will genetically modified crops being allowed in the City of Onkaparinga have an impact on the trade or marketing of your business?

What do you estimate the financial impact could be for your business?

Will genetically modified crops being allowed in the City of Onkaparinga have an impact on the number of people your business employs?

Are you able to estimate the amount of the annual impact for your business? (Please specify)

Based only on trade and marketing implications, do you support council applying to the Minister for Primary Industries and Regional Development, asking that the City of Onkaparinga is designated as a non-GM crop area?

Please explain why?

Aside from the trade and marketing implications, do you have any other comments regarding genetically modified crops in the City of Onkaparinga?

If you have any additional supporting evidence or other material you'd like to submit, please upload it now.

The feedback we collect in this survey will be collated and presented without identifying individual responses, unless you give us permission to include quotes from your survey results via the question below. If you prefer you can choose for your response to remain anonymous\*.

\*We will endeavour to keep your details private, however under the Freedom of Information Act 1991 it is possible that we may be required by law to make your full submission/survey details public.

# Questions asked of organisations representing businesses

## ASKED OF:

1. ORGANISATIONS REPRESENTING PRIMARY PRODUCERS & FOOD MARKETS (KEY STAKEHOLDERS)
2. BUSINESS AND TOURISM ASSOCIATIONS (SECONDARY STAKEHOLDERS)

Are you responding as a business owner/primary producer, an association or incorporation representing your members, or a community member?

What is the name of the association or incorporation you are representing?

How many members does your association or incorporation have?

Which industry/industries best represents your members?

What types of goods do your members typically produce/manufacture/retail/export?

How likely are there to be trade and marketing impacts on your members by genetically modified crops being allowed in the City of Onkaparinga?

How will genetically modified crops being allowed in the City of Onkaparinga have an impact on the trade or marketing for your members?

What do you estimate the financial impact could be for your members (based on an average member)?

Are you able to estimate the amount of the annual impact for an average member? (Please specify)

Based only on trade and marketing implications, do you support council applying to the Minister for Primary Industries and Regional Development, asking that the City of Onkaparinga is designated as a non-GM crop area?

Please explain why?

Aside from the trade and marketing implications, do you have any other comments regarding genetically modified crops in the City of Onkaparinga?

If you have any additional supporting evidence or other material you'd like to submit, please upload it now.

The feedback we collect in this survey will be collated and presented without identifying individual responses, unless you give us permission to include quotes from your survey results via the question below. If you prefer you can choose for your response to remain anonymous\*.

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# Questions asked of the general community

ASKED OF:

1. RESIDENTS LIVING IN THE CITY
2. GENERAL PUBLIC LIVING OUTSIDE THE CITY

Are you responding as a business owner/primary producer, an association or incorporation representing your members, or a community member?

What is your link to the City of Onkaparinga? Resident / Worker / Investment property owner / Visitor / Other

How often do you choose products based on them being labelled as GM-free?

What year were you born?

Where do you live?

Based only on trade and marketing implications, do you support council applying to the Minister for Primary Industries and Regional Development, asking that the City of Onkaparinga is designated as a non-GM crop area?

Please explain why?

Aside from the trade and marketing implications, do you have any other comments regarding genetically modified crops in the City of Onkaparinga?

If you have any additional supporting evidence or other material you'd like to submit, please upload it now.

The feedback we collect in this survey will be collated and presented without identifying individual responses, unless you give us permission to include quotes from your survey results via the question below. If you prefer you can choose for your response to remain anonymous\*.

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# ELECTED MEMBER WORKSHOP SUMMARY

TUESDAY 25 AUGUST 2020

## GM CROPS - COMMUNITY ENGAGEMENT RESULTS

### IN ATTENDANCE

Mayor Erin Thompson, Cr Alayna de Graaf, Cr Wayne Olsen, Cr Bill Jamieson, Cr Sandra Brown, Cr Simon McMahon, Cr Martin Bray, Cr Geoff Eaton and Cr Richard Peat (via zoom).

Apologies: Cr Marion Themeliotis, Cr Michael O'Brien

Session delivered by Ynys Onsman, Manager Strategic Futures (acting)

### WORKSHOP PURPOSE

The purpose of this session was to present the results of the 'GM Crop' community engagement to Elected Members, undertaken to help inform a position on whether or not Council should make a request to the Minister for Primary Industries and Regional Development to designate the City of Onkaparinga as a non-GM crop area. At the request of elected members, external presenters also provided information on this topic.

Pre-reading material was prepared and distributed to elected members prior to the workshop. This consisted of:

- Research Brief – a summary of key research demonstrating both the risks and benefits associated with the cultivation of GM crops, particularly in relation to trade and marketing.
- Engagement analysis report – analysis of the findings from the feedback received via survey responses and submissions received through the GM Crops consultation period.
- Written submissions received during the consultation period.
- Late submissions received.

### SUMMARY OF DISCUSSION

#### Guest Presenters

Adrian McCabe, Chair Grain Producers SA (GPSA) and Leighton McDonald-Stuart, Analyst (GPSA)

*Grain Producers SA is a not-for-profit organisation which represents all grain producers who have contributed funds through the Primary Industries Funding Scheme. GPSA develops and implements policies and projects that promote the economic and environmental sustainability of South Australian grain growing businesses.*

Key points:

- South Australia is the last mainland state to remove its ban on commercial cultivation of GM crops
- Independent economic analysis demonstrates that the GM moratorium does not provide trade and marketing benefits to the majority of agricultural producers in SA.
- The effect of SA's GM-free status is to remove the option of utilising innovative tools, licenced by the Commonwealth's scientific regulator as safe.
- South Australian growers need access to all the tools on offer for best practice crop production.

- Anderson report – The moratorium has cost SA's grain industry at least \$33 million since 2004.

Both the Mecardo Report and the Anderson Review demonstrate that coexistence between GM cropping and other industries will not be affected – GPSA particularly noted the coexistence of GM Crops and vineyards in Yarra Valley and Margaret River.

Elizabeth Pitcher, Director National Association for Sustainable Agriculture Australia (NAASAA)

*NASAA Organic is a not-for-profit company supporting and promoting the adoption of organic practices. The NASAA Organic label represents the highest level of organic assurance to traders and consumers allowing entry into Australia's organic markets.*

Key points:

- Economic benefits to the Onkaparinga region
- Organics fetch consistent premiums for local producers
- Average sale value per hectare \$3,277
- NCO and ACO total certified organic hectares around 1772
- NCO and ACO total value of organic sales p/a is around \$5.8million

McLaren Vale has the highest percentage of certified Organic and Biodynamic vineyards by Area Under Vine in Australia (37%) – national average of 5%

Jennifer Lynch, General Manager McLaren Vale Grape Wine and Tourism Association (MVGWTA)

*MVGWTA provides the major industries of the McLaren Vale region – wine, food and tourism – with a vision for the future in both domestic and international markets. It acts as a broker and representative of those industries and is the driving force behind their development.*

Key points:

Comparative values in City of Onkaparinga

- Commercial footprint of grains crops = \$0.9million, <1% of total gross regional product for Agriculture
- Commercial footprint of our grape and wine crops = \$56.4 million in Vintage 2020, >50% of total gross regional product for Agriculture.

Certified Biodynamic and Organic Production

- Nationally: 5% of Total Area Under Vine
- McLaren Vale: 37% of our Total Area Under Vine ("grape crop")

d'Arenberg Wines case study

- Certified organic and biodynamic producer
- Exports to 80+ countries
- \$1.2million annual turnover in (11 countries) these markets combined
- A number of letters supplied to demonstrate that if GMO was permitted in the area then they (countries) would not purchase from the region due to laws prohibiting GMO or reduced demand for GMO products.

## Community Engagement results

High level results were provided from the community engagement survey and submissions.

Key points:

- We promoted the consultation through banners, posters, targeted letters, emails and social media
- Overall we had 314 survey responses and 46 submissions. 88 responses were from the key stakeholder group (primary producers, food processors and fresh produce sellers), with some of those responses being from associations that represent a large member base.
- 70% of key stakeholders and 80% of community said we should apply to be GMO free
- 73% of those key stakeholders saying yes cited trade and marketing reasons
- Along with the above sentiment, the consultation also requested that responders provide evidence to back their position (related to trade and marketing).
- No contracts or region-specific studies were provided during the consultation period to either support or not support an application to the Minister. (d'Arenberg has subsequently done so)

Much other evidence was provided by both those arguing for and against designation as GM crop free, including references to price guides for different crops, academic articles, media articles, independent reviews and consumer purchasing guides.

## Questions from Elected Members

Cross contamination risks including that from other neighbouring LGAs

Details on the d'Arenberg case study – market perception or certification

Round up resistant weeds

Why is our organic produce uptake so high?

Request for further trade and marketing evidence

Can we gather further evidence outside of the consultation period?

What is the economic prediction of this decision?

Can we provide the engagement report to community?

Introduction of GMO in the region flips the onus of proof to the organic grower – how to prove their products or their produce management have not been contaminated.

Options:

If YES: draft application to the Minister to Council on 15 September for consideration

If NO: engagement results and report on process come to Council on 15 September for consideration.

The majority of elected members indicated that they wanted us to draft an application to the Minister for their review.

## NEXT STEPS

We will draft a submission to the Minister requesting that City of Onkaparinga be designated a non-GM crop area to be reviewed by Council at the 15 September Council meeting.