



Workshop on the ASSAF NBT report
DNAbiotec, 25A De Havilland Crescent, Persequer Park, Pretoria.
20 June 2017

General Impressions



Balanced and consistent with other views

- **Clear, predictable and scientifically based** government policy
- **Proportionate regulation** based on scientific evidence of **risk**
- **Adaptive regulation** that takes into account accumulated knowledge and experience
- Products developed through the latest breeding methods should not be differentially regulated

Definition of GMO according to the Act of 1997:

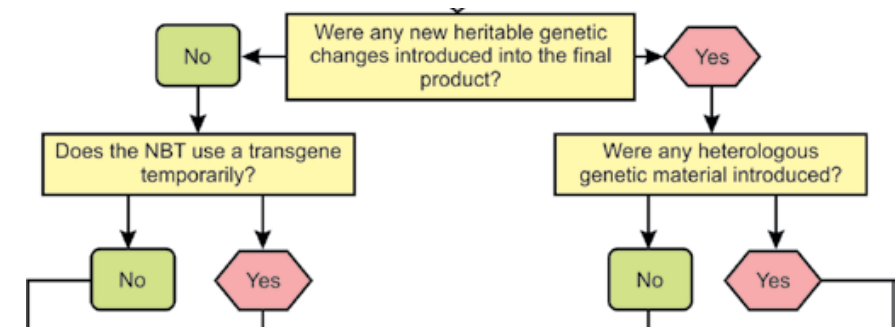
- Product-based regulatory process
- Triggers for regulation

Plant industry appreciates

- ❖ The proposed decision tree developed by ASSAf to ensure predictability of the regulatory status for products developed with the application of innovative breeding methods.

Decision Tree - clarity needed

- ❖ Introduction of “heritable genetic changes” in the final product (yes)
 - ❖ The decision tree does not account for the use of transient transgenic step when targeted mutations are introduced in the final product
 - ❖ Need to clarify the understanding of ASSAf about “heritable genetic changes” and how these could be fitted under the decision tree - potential conflict between the decision tree and the arguments presented in the text, especially chapter 7 of the report



Suggestions

- ❖ Testing of the decision tree using real-life examples for different product categories is recommended in order to address potential challenges in its implementation
- ❖ Develop an implementation process of the decision tree
 - ❖ It could be based on self-determination by the developer
 - ❖ Clear and predictable timelines and data requirements in support of the regulatory decision making should be identified

Suggestions Cont

- ❖ History of GMO regulation and the involvement of RSA in the development of the global process (CBD) could be strongly underlined

A photograph of a shirtless man wearing a hat, operating a red tractor in a rural field. The tractor is in the foreground, and the background shows a green field with a line of trees in the distance under a clear sky. A semi-transparent blue bar is at the top of the image.

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