



Submission to:
Second Call for
submissions –
Proposal P1055

09/09/2024

wePlanetTM
AUSTRALIA



To:
Food Standards Australia New Zealand

wePlanet[™]
AUSTRALIA

Re:
WePlanet Australia submission to: Second Call for submissions –
Proposal P1055

About Us

WePlanet Australia was founded in 2022 and is an eco humanist organisation that seeks to promote public policy which will help address a range of social and environmental issues including climate change, biodiversity loss and poverty.

Our organisation is the Australian chapter of WePlanet, a global network of citizen movements with the goal to liberate nature and elevate humanity.



We appreciate the opportunity to provide feedback on the proposed changes to the Food Standards Australia New Zealand (FSANZ) regulations concerning gene technology and new breeding technologies (NBTs). As an organisation committed to promoting sustainable and ethical environmental policies, WePlanet Australia strongly supports the need to modernise and clarify the regulatory framework for gene technology in food production.

WePlanet Australia welcomes the update to the definition of gene technology in the ANZ Food Standards Code. We believe these changes will better reflect the evolving science behind food production and meet the expectations of both consumers and the food industry.

Support for NBTs and Updated Gene Technology Definition

The proposed regulatory changes acknowledge that NBTs, when used to produce food with characteristics equivalent to those produced through conventional breeding, present no greater risk to consumer safety. We strongly agree with this conclusion. This alignment of the food safety framework with the Office of the Gene Technology Regulator (OGTR) in assessing NBTs' low risk is a positive step toward a coherent and streamlined regulatory environment. As demonstrated by the CSIRO's success in safely bringing various genetically modified crops to market, such as omega-3 canola and high oleic safflower, it is clear that gene technology has been managed safely for decades.

Recent consumer focus groups show that Australians are increasingly supportive of the environmental benefits of NBTs. Importantly, they do not view new breeding technologies in the same light as older genetic modification techniques. As such, WePlanet Australia believes that the regulatory framework should reflect these changing perceptions. The regulatory distinction between NBTs and traditional GMOs should be based on product characteristics and risk, rather than a blanket labelling classification of all gene technologies as "genetically modified". This nuance will foster greater consumer trust while continuing to uphold rigorous food safety standards.



Clear and Accurate Labelling

We support FSANZ's proposal that food derived from NBTs, when equivalent to conventionally bred products, should not be labelled as GM food. Clear labelling is essential for consumer confidence, and conflating NBTs with older GMO technologies could lead to confusion. Given that NBTs carry a lower risk profile and do not involve the same concerns historically associated with GMOs, WePlanet Australia agrees that it is unnecessary and potentially misleading to label such products as genetically modified.

We also acknowledge that there will be cases where labelling will remain important, such as for precision fermentation and cell-cultured food products. In these instances, where novel DNA or genetically modified cell lines are used, labelling under the gene technology framework is appropriate to maintain transparency. However, in the case of NBTs that do not introduce novel DNA, labelling as GM food does not align with the product's risk or consumer perception.

Support for Emerging Food Technologies

WePlanet Australia supports the continued regulation of precision fermentation and cell-cultured foods under the gene technology framework, particularly when these products involve the insertion of new cisgenic or transgenic elements. However, we believe that FSANZ should develop a streamlined approval process for these emerging food technologies. Precision fermentation and cell-cultured foods have the potential to play a significant role in reducing the environmental impact of food production; and a more efficient regulatory pathway will support the safe and ethical development of these industries.

Streamlining the approval process will help facilitate innovation while maintaining high standards of safety. Such a framework would benefit consumers, the environment, and the food industry by accelerating the availability of sustainable, low-impact food products.



Decadal Review of Regulatory Framework

While WePlanet Australia supports FSANZ's proposed definition of gene technology, which includes the insertion of novel DNA, we believe that the framework must remain adaptable as scientific advances continue to shape the future of food production. To this end, we recommend that FSANZ institutes a decadal review of the regulatory approach. This review would provide a valuable opportunity for stakeholders—including regulators, industry, and consumers—to assess whether the current regulations remain fit for purpose as new technologies emerge.

The ongoing evolution of gene technology and its applications in food production demand a regulatory framework that is responsive to change. A periodic review will ensure that Australia remains at the forefront of innovation while maintaining the highest safety and ethical standards.

Conclusion

WePlanet Australia fully supports the modernisation of the FSANZ regulatory framework to reflect the latest advancements in food production technologies, particularly the inclusion of NBTs in the revised gene technology definitions. We commend FSANZ for taking steps to align the regulatory framework with scientific evidence and consumer expectations. By distinguishing NBTs from traditional GMOs and facilitating the development of new food technologies, these changes will promote innovation, sustainability, and public trust in Australia's food system.

We recommend that FSANZ proceed with the proposed changes, alongside clear labelling requirements that reflect consumer expectations and product characteristics. Additionally, we urge FSANZ to establish a decadal review mechanism to ensure the regulatory framework evolves in step with scientific and technological progress.

We thank FSANZ for the opportunity to provide input on this important issue and look forward to the continued development of a modern, effective regulatory environment for gene technology in food production.



Yours sincerely,
WePlanet Australia

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Thank you for the
opportunity to
provide a
submission on this
important issue

This submission does not need to be
kept confidential and may be published.

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