



Food Standards Australia New Zealand (FSANZ)

Consultation Hub

Via: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

**Re: Second Call for Submissions: P1055 Definitions for gene technology and new breeding techniques**

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to Food Standards Australia New Zealand (FSANZ) regarding Proposal 1055: *Definitions for gene technology and new breeding techniques*.

The NFF is the voice of Australian farmers and was established in 1979 as the national peak body representing farmers and the agriculture sector more broadly, across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

The NFF recognises the potential of genetic modification (GM) and particularly new breeding techniques (NBTs) as a valuable tool within agricultural production systems. The responsible and strategic application of gene technology within Australian production systems thus far has resulted in significant benefits for Australian farmers, the environment, consumers and the Australian economy.

We strongly support the scientific rigour of the national scheme through which these technologies are regulated. There is great potential to expand the development and use of these technologies to meet future challenges in areas such as human health, agricultural productivity and environmental sustainability.

Realisation of the potential benefits of gene technology in Australia depends on a regulatory environment that keeps pace with technological change, provides certainty, effectively manages risk and promotes investment in research and development.

The NFF supports a modernised regulatory environment that is better harmonized with international standards and which appropriately incentivises the development of new techniques and introduction of products in the Australian market.

Australian farmers are well-placed to responsibly harness the enormous opportunities NBTs offer. Farmers recognise the importance of harmonious co-existence between conventional and organic enterprises, which is critical to ensuring a diverse food and fibre market for consumers.



The NFF acknowledges the need for Australia's GM regulation to be updated in line with rapid developments in genetic modification in the last two decades, and believes the proposed FSANZ approach largely addresses the fundamental needs of industry.

We support the shift from a process-based approach to a product-centric approach to better reflect the complex array of available gene technologies.

The NFF strongly supports implementing a clear definition of 'Novel DNA' that does not discriminate against products indistinguishable from those that have or can be produced by conventional breeding.

The NFF believes FSANZ has aptly summarised the significant benefits of the proposed changes to the Food Standards Code in its supplied consideration of costs and benefits.

The agriculture industry has already benefited significantly from the application of gene technology over the past two decades and is well-positioned to embrace the transformative opportunity NBTs present.

A reduced regulatory burden through simpler, more straightforward regulation will provide certainty for innovators and promote the introduction of safe, beneficial new products to market.

The harmonisation of Australia's regulatory environment with the international system will also support Australian producers to engage more strongly with new and existing global markets and help to address key challenges such as climate change and health.

Given the general lack of public awareness around emergent biotechnology, the NFF believes further clarifying information or 'guidance material' be made available to the public over the strong safety record and vast potential of NBTs.

This would promote improved understanding and transparency and reinforce the world-leading scientific governance Australia boasts.

The NFF thanks FSANZ for the opportunity to make a submission on Proposal 1055. The policy contact for this matter is Mr Zac Rayson, Senior Policy Officer (Rural Affairs), via e-mail: [zrayson@nff.org.au](mailto:zrayson@nff.org.au).

Regards,

**TONY MAHAR**  
CEO