

Submission to P1024

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28 July 2017

Friends of the Earth oppose the proposed framework. The framework is overly simplistic in its eligible food criteria (EFC), overly reliant on self-regulation and fails to discuss in any way how the proposed framework would address foods or ingredients produced using new technologies.

We have considered how food containing nanomaterials or foods or ingredients produced using synthetic biology would be treated in the proposed system.

For example, a vanilla produced using synthetic biology that is claimed to be genetically identical to vanilla is unlikely to be captured under this framework. Nanomaterials, where the bulk form of the material has a history of safe use are also unlikely to be assessed – despite having potentially different properties.

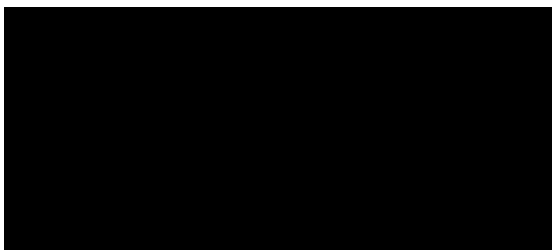
The EFC do not appear intended to address any technological development or novel production methods that may result in different characteristics to previously approved foods.

Ensuring that producers have a dossier that demonstrates the safety of foods not subject to pre-market assessment is a long overdue requirement. However, the overwhelming evidence is that data produced by industries with a vested interest in the outcome is inherently unreliable. Such a self-regulatory system would depend on rigorous, frequent and independent monitoring of the data produced. There is nothing in FSANZ's monitoring history that suggests that this is likely to occur. In fact, the current framework doesn't appear to require any reporting to FSANZ at all of foods that meet the EFC and simply go to market.

While this is far simpler than the previous P1024 proposal it is no improvement. The only beneficiaries of this framework will be the food industry.

A more sophisticated regulatory approach and one more oriented towards public health and public good is needed.

Sincerely yours



Jeremy Tager