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4 September 2024

Food Standards Australia New Zealand (FSANZ) PO Box 5423 KINGSTON ACT 2604

Via: submissions@foodstandards.gov.au

Re: Proposal P1055 - Definitions for gene technology and new breeding techniques

Thank for the opportunity to make a submission in response to the 2nd consultation on Proposal P1055 - Definitions for gene technology and new breeding techniques.

1. About Grain Trade Australia

<u>Grain Trade Australia</u> (GTA) is a national member association and is the focal point for the commercial grain industry within Australia.

GTA has over 290 organisations as members. Their businesses range from regional family businesses to large national and international trading/storage and handling companies who are involved in grain trading activities, grain storage, grain marketing advisory services, processing grain for human consumption and stock feed milling. GTA Members are substantial employers, from the farm gate through to end point consumption, and notably in rural and regional Australia. Australia's grain is exported by GTA members. A full list of GTA Members in annexed to this submission.

GTA's core focus is to 'facilitate trade' in the Australian grain industry. It's products and services, including the Australia Grain Industry Code of Practice, provides a self-regulatory framework across the grain industry to facilitate and promote the trade of grain within the Australian grain value chain.

GTA's Plant Breeding Innovation Committee provides advice and input in relation to new breeding technologies (NBTs). In relation to plant breeding innovation, GTA has developed the:

- <u>Market Choice Framework for GM Crops</u> (built on the canola industry's Market Choice Framework developed in 2008); and
- <u>Grain Industry Stewardship Framework for New Technologies</u> where Schedule 1 deals with NBTs.

These tools have been developed to ensure the introduction of these technologies into the supply chain is undertaken in a manner that does not disrupt trade.

GTA is also actively involved in industry discussions on these issues globally via membership of the International Grain Trade Coalition (IGTC), with harmonising of regulations a key focus.

P1055 proposal from FSANZ is another important step in ensuring alignment across the Australia's regulatory environment to assist the commercial path to market for these technologies.

Introduction

The use of next-generation plant breeding techniques (NBTs) has the potential to deliver significant benefit to the grains industry through driving innovation and productivity.

GTA welcomes the FSANZ Proposal P1055 to amend and clarify the definitions for 'food produced using gene technology' and 'gene technology' in the Australia New Zealand Food Standards Code (the Code). GTA's previous submission supported the need to future proof the Code in relation to products from NBTs and to regulate foods according to the risk they pose.

GTA supports the move towards product-focused regulation and the shift to a product-based regulatory framework, which modernises the regulatory framework and aligns with global standards to better incorporate NBTs.

GTA has not responded to the consultation questions specifically but provides feedback from the perspective of the impact on trade. GTA recognises that industry bodies such as CropLife Australia and the Australian Seed Federation (ASF) will have specific comments around the technical detail of the proposal.

Overall GTA is supportive of the proposed product approach and updated definitions which will deliver a simpler and clearer approach to regulation of GM foods and those derived from NBTs. This approach aligns with GTA position in our previous submission which advocated for a more risk proportionate regulatory approach.

GTA in its previous submission highlighted the importance of alignment with international regulations, particularly as a number of Australia's trading partners are evolving regulations to take a more risk-proportionate approach to NBTs. Alignment and regulatory coherence will assist governments to avoid unnecessarily eroding the value of the innovation and/or driving up costs and complexity in the global food system. Thus, GTA supports the approach to seek to harmonise where this is appropriate.

Definitions

GTA welcomes the proposed changes to the definitions to provide greater clarity around GM foods; to better accommodate new and emerging genetic technologies; and to regulate NBT foods in a manner commensurate with the risk posed.

Clear definitions within the FSANZ proposal are essential not only for regulatory efficiency, but also for fostering innovation and ensuring food security.

GTA supports the updated definition of GM Foods in principle, however, we are concerned that the novel DNA definition could lead to industry and consumer confusion. In comparison other jurisdictional definitions, such as Canada, the proposal appears to be needlessly complex. A simplified definition is likely to provide greater clarity for all stakeholders.

GTA understand that CropLife have proposed some areas of consideration to address this in their submission.

Conclusion

GTA welcomes the opportunity to provide feedback on the FSANZ P1055 proposal. We support the approach to provide greater clarity around the definition of a GM food which will assist to ensure has a fit for purpose approach that provides confidence to consumers, but does not hinder innovation for Australian farmers, nor adversely impact trade. The proposed changes should support a balanced regulatory approach that fosters innovation, protects consumer safety, and aligns with international standards.

Yours faithfully,

Pat O'Shannassy

Chief Executive Officer



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			3	
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	A4	ADM Trading Australia	Darryl Borlase	www.adm.com
		Arrow Commodities	Dominic Vanzella	www.arrowcom.com.au
		Australian Grain Export Pty Ltd	Tim Martin Stephen Bennett	www.australiangrainexport.com.au
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		George Weston Foods	Michael Schmidt	www.gwf.com.au
		Manildra Group	Peter Sloan	www.manildra.com.au
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	B2	Centre State Exports	Jeff Voigt	www.centrestateexports.com.au
		ETG Commodities	Peter McMeekin	www.etgworld.com
		Inghams Enterprise Pty Ltd	Matt Clarke	www.inghams.com.au
		J K International Pty Ltd	Sandeep Mohan	www.jki.com.au
		Ridley Agriproducts	Reagan Stroud	www.agriproducts.com.au
		Riverina (Australia)	Jon Mulally	www.riverina.com.au
		Wilmar Gavilon Pty Ltd	Matt Albion	www.wilmargavilon.com
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	рэ	Allied Pinnacle Brahman Commodities	Brett Duczmal Michael Aikman	www.alliedmills.com.au www.brahmancommodities.com.au
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		Demeter Grains	Barry Mansfield	www.demetergrains.com.au
		K M & W M Kelly & Sons	Matt Kelly	www.kellygrains.com.au www.kellygrains.com.au
		Quadra Commodities	Robin Cassar	www.quadra.com
		Qube Logistics (SB) Pty Ltd (T/A Qube Agri)	Jeremy Brown	www.qube.com.au
		Robinson Grain Trading	Adam Robinson	www.robinsongrain.com.au
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		Agrisk (Market Check)	Brett Stevenson	www.marketcheck.com.au
		AGT Foods Australia	Michael Brittain	www.agtfoods.com/australia
		Associated Grain t/a Agrocorp Processing Australia	Russell Darbey	www.agrocorp.com.au
		Australian Food & Fibre Processing	Peter Webb	www.australianfoodandfibre.com.au
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		Blairs Produce Company	Sean Blair	crt.com.au/store/blairs-produce-company/
		Boolah Farms Pty Ltd	Stuart Tighe	www.boolah.com.au
		Castlegate James Australasia Pty Ltd	Ross Giovanetti	www.castlegatejames.com.au
		COPRICE Danvalla Milling Co. Phy Ltd.	Hugo Steinfort	www.coprice.com.au
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		Esperance Quality Grains Pty Ltd	Neil Wandel	www.deckerts.com.au www.esperencequalitygrains.com
		Fletcher International Exports	Joe Masters	www.fletchint.com.au
		Fodder Link Pty Ltd	Cameron Angel	www.fodderlink.com.au
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		Hazeldenes Chicken Farm	Marcus Dingle	www.hamonenterprises.com.au www.hazeldenes.com.au
		IGH Commodities	Brad Bryant	www.igh.net.au
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		Irwin Stockfeeds	Bryan Irwin	www.irwinstockfeeds.com.au
		Itochu Australia Ltd	Ayush Rajvanshi	www.itochu.com.au
		Jerilderie Grain Storage & Handling	David Barlow	www.jgsh.com.au
		Laucke Flour Mills Pty Ltd	Roger Laubsch	www.laucke.com.au
		Lawson Grains	John Marshall	www.lawsongrains.com
		LPC Trading Pty Ltd	Simon Langfield	www.lpctrading.com.au
		Malteurop Australia Pty Ltd	Eric Fisher	www.malteurop.com/en/australia
		MC Croker	Jason McPherson	www.crokergrain.com.au
		MSM Milling Pty Ltd	Peter MacSmith	www.msmmilling.com.au
		Namoi Cotton Ltd	Nathan Hunter	www.namoicotton.com.au
		Pentarch Agricultural Pty Ltd	James Whiteside	www.pentarch.com.au
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		Reid Stockfeeds Pty Ltd	lan Reid	www.reidstockfeeds.com.au
		Rex James Stockfeed	Natasha Davies	www.jamesstockfeed.com.au
		Rivalea (Australia) Pty Ltd - Animal Nutrition	Andrew Philpotts	www.rivalea.com.au
		Riverina Oils & Bioenergy	Krissy Campbell	www.riverinaoils.com
		SunPork Farms Feed Mills	Mark Young Charlie Brown	www.sunporkgroup.com.au
		ThriveAgri Pty Ltd	Trevor Macleod	www.thriveagri.com www.tasstockfeed.com.au
		TSS Grain (Tasmanian Stockfeed Services)		www.unigrain.com.au
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		W B Hunter Pty Ltd	Stewart Coombes	www.wbhunter.com.au
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		Woods Grain Pty Ltd XLD Commodities	Bruce Woods John Tuskin	www.woodsgroup.com.au
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International Affiliate	CIS Commodity Inspection Services	Paul Schweitzer	www.cis-inspections.com
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Industry Association	AEGIC	Courtney Draper	www.aegic.org.au
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	Grain Producers Australia Ltd (GPA)	Colin Bettles	www.grainproducers.com.au
	NSW Farmers Association	Elen Welch	www.nswfarmers.org.au
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