

19 April 2018

Project Manager  
Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
Wellington 6143  
NEW ZEALAND

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

Dear Sir/Madam

The New Zealand Food & Grocery Council comments ***Consultation paper – Food derived using new breeding techniques*** are as follows.

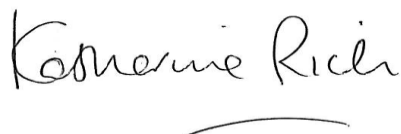
NZFGC does not consider the new breeding techniques require separate and ongoing risk assessment. Where no new DNA is introduced even if the genome is changed then we consider the risk to the consumer is no different to food from conventional; breeding techniques.

Additionally, even though the genome might have new DNA initially, in the new breeding techniques described, new DNA is not included in the final product. Rootstock grafting is an example of the new DNA being confined to the rootstock. Food derived from it would be the same as food from conventional rootstock.

In our view, it would also be important that action is not taken ahead of the two other reviews underway by the Office of the Gene Technology Regulator.

In applying a risk-based approach to the food regulatory system, low risk activities should not attract regulator intervention. However, we commend FSANZ for establishing an Expert Advisory Group on New Breeding Techniques as an interim measure to advise on and monitor developments.

Yours sincerely



Chief Executive  
New Zealand Food & Grocery Council