

April 18, 2018

Via email: NBTConsultSubmissions@foodstandards.gov.au.

Food Standards Australia New Zealand (FSANZ)
Level 4
15 Lancaster Place
Majura Park ACT 2609
Australia

Level 3
154 Featherston Street
WELLINGTON 6011
New Zealand

Re: Consultation Paper: Food Derived Using New Breeding Techniques

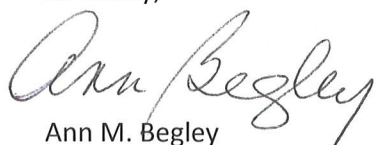
Dear Sir and Madam:

The Enzyme Technical Association (“ETA” or “Association”) is a trade association that represents manufacturers and marketers of enzyme products in North, Central, and South America. It has been in existence since 1970 and maintains an active role in assisting in the development of regulations and policies that affect the enzyme industry. ETA represents the majority of the enzyme product industry in the Americas.

The ETA appreciates the opportunity to provide feedback on the Food Standards Australia New Zealand’s (FSANZ) “Consultation Paper: Food Derived Using New Breeding Techniques.”¹ In light of rapidly evolving technologies that include but are not limited to gene editing, ETA wishes to emphasize the need to develop a product-based, risk-focused oversight framework and pre-market approval process.

We thank you for your time and consideration. Please do not hesitate to contact us if you have any questions.

Sincerely,



Ann M. Begley
Secretary & General Counsel
Enzyme Technical Association

¹ Food Standards Australia New Zealand (FSANZ), Consultation Paper: Food Derived Using New Breeding Techniques (Feb. 2018),
<http://www.foodstandards.gov.au/consumer/gmfood/Documents/Consultation%20paper%20-%20Food%20derived%20using%20new%20breeding%20techniques.pdf>.