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**Cc:** standards management <standards.management@foodstandards.gov.au>; FSANZ General email <slo@foodstandards.gov.au>

**Subject:** Linda Z Grammer submission to FSANZ (in response to consultation on new Breeding Techniques

18 April 2018\

Submission to Food Standards Australia NZ (FSANZ)

Responding to FSANZ public consultation on "New Breeding Techniques"

Submission by:

Linda Z Grammer  
& family  
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NEW ZEALAND

Thank you for the opportunity to submit.

Our farming family is extremely concerned about all of the new breeding techniques being reviewed by FSANZ (for food production), including but not limited to CRISPR. We want them all to be regulated, we don't want these used to produce food, and if they are used, all food produced in this way MUST be fully labelled to protect consumers like ourselves who don't wish to purchase or eat these risky new foods.

We are also extremely concerned about some of the members of the panel of FSANZ (who have clear bias and vested interests) and a number of FSANZ's recent deeply flawed decisions (including the approval of American lines of processed (toxic) GE potatoes, for importation into NZ and Australia as a processed food). It is appalling that these processed GE potatoes can be sold in NZ supermarkets and dairies (we demand that they be clearly labelled to identify them as such) and that the GE potatoes won't be identified if used by takeaway businesses, fast food premises or restaurants.

FSANZ has consistently approved GE derived foods, regardless the known risks of some, and the lack of appropriate safety testing, makes it all the more important that Food Derived From 'New' Breeding Techniques be disallowed until more in-depth, independent, and objective research is undertaken about the safety of such foods. Genuine precaution must be the cornerstone of decisions around food safety using new technologies.

We while strongly support the submissions made by GE Free Tai Tokerau (GE Free Northland) as well as Steffan Browning (former Green party MP in NZ) GE FREE NZ, we

wish to express our opposition/ concerns to the FSANZ review in its current form. We share the concerns of Physicians & Scientists for Global Responsibility Charitable Trust (NZ) and the Soil & Health Association Aotearoa about the risk assessment processes and advice of FSANZ.

In our view, this consultation is INVALID until genuine independence and objectivity of scientific advice, risk assessment and process is followed by FSANZ.

By the selection of this panel with so much conflict of interest without equal weight of independent experts demonstrates failure of the FSANZ board to perform their obligations (including legal ones) under the FSANZ Act to ensure a high degree of confidence in the quality and safety of food produced.

The selection of this panel without independent experts to do this review is unreasonable and unjust, leaving the Board open to judicial review.

**Required outcome** is to cancel this review until an acceptable panel of experts is nominated that represents the best interests of the principal beneficiary, the public of NZ and Australia

#### **FSANZ Act**

**Object of which** is to ensure a high standard of public health protection throughout Australia and NZ.... to achieve the following goals

- a) a high degree of consumer confidence (trust) in the quality and safety of food produced
- b) an effective, transparent and **accountable** regulatory framework...

**The Board is reminded that government officials (elected ,appointed, hired) have a Fiduciary Duty to act in the best interests of the beneficiary (the public of New Zealand and Australia) and all of a fiduciary's actions are performed for the benefit of the beneficiary.**

By definition the Board and advisory panel are fiduciaries and therefore must exercise

**duty of loyalty** by putting the public's interest before their own or indirect personal interests, i.e. there can be no conflict of interest

**duty of impartiality** by avoiding targeting particular constituents for favour, i.e. giving preference of the GE industry over the public and

**duty to maintain Public Trust in government**