



**To:** Food Standards Australia New Zealand

**From:** [Redacted]  
[Redacted]  
[Redacted]

Field Code Changed

**Date:** Friday 3 December 2021

**Re:** **Proposal P1055** Definitions and the Need for Continued Regulation of current and future New Breeding Techniques (NBTs)

Buy Pure New Zealand™ (Buy Pure) has developed and continues to build a thriving trading community of organic, natural and fair trade brands throughout the Oceania, Pacific and Asian marketplaces.

For over two decades, we have been building networks to help create successful trading partnerships. As a result of this pioneering approach, we are recognised leaders in providing growth strategies and trade facilitation for sustainable New Zealand brands.

We have commercial experience in the power and differentiation in international markets Non-GMO has. New Zealand is renowned for holding this position and delivering goods to customers that want and demand it.

Our submission highlights findings from our research on the need to heed, respect and deliver on the national and international public expectations for new breeding techniques (NBT) regulation, which is similar to expectations for other genetically modified products.

#### Buy Pure

1. Support the precaution and direction provided to FSANZ by INBI. (Centre for integrated Research on Biosafety, University of Canterbury)
2. Oppose any exemptions of NBTs - current or future gene editing
3. Ask that public expectations be respected not sidelined or ignored in favour of industry
4. Ask that public expectations be met for tools like safety testing, genomic sequencing be required in methodologies for safety assessment and approval
5. Ask that NBT products must be registered
6. Ask that products from NBT be labelled to allow consumer choice.



Buy Pure also has the following required actions by FSANZ for inclusive definitions and no exemptions for NBTs for future food safety and public confidence:

1. FSANZ must prioritise consumer-citizen needs and the expectations for acceptable regulation, safety testing, labelling and monitoring
2. Definitions should not allow exemptions from any NBTs from safety oversight and exemption from being listed on a register
3. FSANZ's previous exemption of SDN1 products should be reversed
4. Use of NBT processes should trigger safety oversight of all Gene Editing products, including those superficially similar to conventional breeding.
5. NBTs as defined in FSANZ's proposal must not be given exemptions and must be subject to case-by-case safety evaluation.
6. NBT product approval methodologies should require the use of tools such as genome sequencing and Omics as a basis for genuine safety assessment and approval by FSANZ of all products of gene technology.
7. Products of NBT, other new gene editing, and other GM technologies must be required to be listed on a register.

Yours sincerely



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