LETTER TO FSANZ CEO and Board Chair submissions@foodstandards.gov.au

SEEKING AN EXTENSION TEMPLATE

PLACE ON YOUR LETTERHEAD

DATE HERE

FSANZ CEO and Board

PO Box 5423

Kingston ACT 2604

Email: submissions@foodstandards.gov.au

(CC IN NZ FOOD STANDARDS
Food Safety and Security Minister A.Hoggard@ministers.govt.nz

Agriculture and Trade, Forestry Hunting and Fishing T.McClay@ministers.govt.nz

Rural Affairs M.Patterson@ministers.govt.nz

Your local MP

Others you may know in decision-making position

Re: P1055 – revised definitions of gene technology and new breeding techniques

Dear Dr Cuthbert and Ms Beauchamp:

IN YOUR OWN WORDS GIVE SUCCINCT REASON YOU ARE SEEKING AN EXTENSION HERE eg

Since the first round of public consultation on P1055 proposals in December 2021, “FSANZ has revised its proposed approach and prepared a draft variation to the Code” without engaging the general public [YOUR INDUSTRY] or public interest advocates as stakeholders that will redefine key terms in the law and other major consequential changes.

FSANZ new P1055 proposal presents citizens with a revised regulatory model, presented for the first time and as a fait accompli. Despite strong public demands for labels on both GM and genome edited foods, FSANZ “notes GM labelling is out of scope of this proposal”, yet “changes to the labelling provisions in the Code are proposed to clarify existing labelling requirements or are consequential to the revised approach.”

We therefore ask FSANZ to facilitate the following:

1. extend the public comment period for the current round of P1055 proposals for one month, from

September 10, 2024 to October 10, 2024;

2. convene an open forum with civil society organisations in which all the implications of the current P1055 draft proposal are fully detailed, disclosed and discussed;

3. hold another round of public consultations on P1055 as “FSANZ has revised its proposed approach” to a fundamentally different regime from that proposed in December 2021.

The grounds for our modest requests include: (CHHOSE MODIFY)

- The public comment period is too short to consult with our community and business partners fully
- No open forum is in place, as justified in your own FSANZ ANU’s commissioned report, which recommends that “spaces and mechanisms that permit deep community engagement and deliberation about food production processes need to be fostered.” Instead, you have commissioned public opinion polling and focus groups from which groups were excluded.
- No impact analysis on the changes suggested can be found.
- ADD YOUR OWN HERE

Please advise.

Yours sincerely,