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FOOD STANDARDS AUSTRALIA NEW ZEALAND  
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## Submission on Proposal P1055 – Definitions for gene technology and new breeding techniques

Thank you for the opportunity to submit on Proposal P1055.

We are a young, impact-driven company intently focused on tackling the challenges humanity is facing as the result of increasingly unsustainable food production systems. Specifically, we are developing a process to sustainably produce dairy proteins via molecular agriculture (precision fermentation).

The production of safe and nutritious food is as important as is producing that food in an efficient and sustainable manner. We believe we must look to new and novel technologies to help us sustainably produce our food going forward. New Zealand itself is a food producing nation, with an economy heavily reliant on the production of food for others, as well as for ourselves. It is imperative that we quickly move toward a fully sustainable food production platform, and away from unsustainable industrial agricultural practices. These practices are already being disrupted by new technologies, including NBT, at an increasing pace.

It is vital that our Food Safety regulations keep pace with new food production techniques and do not unduly discriminate against foods produced using NBT. **The food regulations must absolutely avoid any stifling of food production innovation, especially as it relates to food that could, and should, be produced in New Zealand using NBT techniques.**

In this regard, ensuring alignment and consistency with international food standards and practices is vital. We need to be thinking broadly about our future foods and how we produce them. Domestic food safety regulations impact on what we consume here, and there is a similar need to ensure proper alignment between these food safety regulations and our food

production regulations. It would, for example, be difficult to conceive of New Zealand having Food Safety regulations which [rightly] supported the consumption of NBT foods while our food production relevant regulations actually prevented their production here... or indeed vice versa, for that matter.

We are broadly supportive of the intent of P1055 in the context of wanting to ensure that the regulations are able to adequately accommodate new and novel foods however they are produced, in an appropriately objective and coherent risk management framework.

More broadly, we would strongly encourage the Government to move forward with reviewing the regulations related to the use of genetic technologies within New Zealand to keep us up to date with modern advances in new breeding technologies and practices elsewhere. The current regulations prevent the local development of a commercial precision fermentation sector, which means: Unless regulations are revised, New Zealand will not be able to compete in this rapidly developing space that is highly relevant to our future as a food producing nation.

SINCERELY,

[Redacted signature]

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