

FSANZ Act Review: Submission Factsheet



CAA provided a submission to the [review of the Food Standards Australia New Zealand \(FSANZ\) Act](#). The review is being undertaken by Australian Government with a focus on modernising food safety regulatory settings. Without any cellular agriculture products in market, our submission was principles-based and included some observations in our dealings with food safety regulation.

Key points included in our submission

Risk-based framework

CAA observes that several FSANZ processes appear to be rules-based, rather than outcomes-based, so sees merit in introducing a risk-based framework. Industry stakeholders should be consulted on the design of the framework. A risk-based framework could help address the definition of “novel food” and clarify regulatory requirements as more products are assessed.

International risk assessments

FSANZ should be allowed to accept risk assessments from international jurisdictions through a Comparable Overseas Regulator (COR) regime. This should reduce assessment times and application costs for novel food applications. CAA supports the introduction of a minimal check pathway that would expedite approvals for products approved by a COR. This would be highly relevant to processing aids. We do not support FSANZ being required to accept overseas risk assessments.

Pathways to amend the Code

CAA believes FSANZ should consider additional pathways to amend food Standards, particularly for novel foods. Currently, the Code can only be amended by an application, which means all risk and cost is currently borne by small (often pre-revenue) food companies.

Codes of Practice

CAA supports the use of Codes of Practice and guidelines to reduce the regulatory cost and overall burden on doing business. These should be developed with industry stakeholders and involve the State enforcement agencies.

Expedited approvals

CAA does not support the removal of the option for expedited approvals. This would have a major effect on the cellular agriculture sector, as applications could be deferred due to their complexity. As a principle, if the system remains user-pays, then the ability to pay for an expedited assessment should be a standard option.

Industry levy & resourcing

CAA does not support an industry-wide levy, as it will increase the burden on companies and stifle innovation, particularly in emerging technologies. A more appropriate way to improve FSANZ resourcing is to increase government funding.

We note that comparable international bodies invest significantly more resources to support standard-setting. Feedback from cellular agriculture companies (domestic and international) highlights the high cost of the FSANZ application process compared with the USA and Singapore. Proposing an even larger cost-shift on to industry is unacceptable.

Contact us for more information

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