



Organic Farm New Zealand

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Submission to Food Standards Australia New Zealand P1055 Definitions for gene technology and new breeding techniques

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OrganicFarmNZ

- OrganicFarmNZ (OFNZ) is a not-for-profit organisation. Our mandate is to increase the community's understanding of organic principles and the practice of organic gardening and farming in New Zealand.
- OFNZ members and supporters belong to regional groups throughout New Zealand, which have two main roles: organic education and organic certification.
- OFNZ offers affordable organic certification options for local market producers in Aotearoa New Zealand.
- OFNZ-certified members are entitled to utilise the BioGro NZ organic standards. Through BioGro, members can access a free, searchable public database of certified organic inputs.
- Gardening and farming organically has benefits for our health, the welfare of animals and the state of our environment.

OFNZ Submission

1. OFNZ rejects proposal P1055 in its entirety.
2. OFNZ acknowledge and support Te Waka Kai Ora, who are Kaitiaki of the Hua Parakore, tikanga led Indigenous verification system and have concerns about how P1055 will impact their ability to uphold their mātauranga Maori through the pathway of Hua Parakore.
3. OFNZ considers the P1055 proposal a breach of Te Tiriti o Waitangi
4. Our producer members are local market producers who work hard to provide safe, healthy certified organic food for the domestic market in Aotearoa New Zealand.
5. P1055 threatens our livelihoods. As for most small businesses, the time and costs of compliance with not only food safety requirements but also organic certification are considerable.

6. P1055 would increase the time and costs of compliance for OFNZ producers, because it would make it harder for them to source GE-free or non-GE ingredients.
7. P1055 threatens the organic sector. Organic producers and consumers globally shun genetic engineering, for a variety of reasons including ethical, economic, environmental, philosophical and health concerns.
8. Gene editing techniques such as CRISPR-Cas9 fall into the category of genetic engineering. They are manipulations of DNA by humans at the cellular level.
9. This is widely understood globally, by consumers and regulators. It is the biotech industry, in attempts to avoid regulation, which is pressing for regulators to redefine these techniques.
10. FSANZ has no right or mandate to redefine gene-editing techniques as NOT being genetic engineering.
11. P1055 would erode consumer trust in certified organic products.
12. Consumers have the right to know about their food and how it's produced and be able to make genuine informed choices. P1055 would make it very difficult for consumers to avoid foods with gene-edited ingredients.
13. The proposal to exempt from GE food safety requirements those foods which have no "novel" DNA in the end product is exactly what the biotech food industry has been pushing for. Consumers have not been pushing for this.
14. However, FSANZ's statutory role is to protect the public. The safety of gene-edited foods is not yet determined with any certainty; therefore, FSANZ must act according to the precautionary principle and continue to regulate all genetically engineered foods (including foods produced using gene editing and "new breeding techniques") as it currently does.
15. Consumers are concerned not just about the end product, but about the whole process of how their food is produced.
16. If gene edited foods are regulated out of FSANZ's scope, there will be no regulation requiring safety checks or traceability of these foods and ingredients, and no way of monitoring possible adverse effects.
17. This means FSANZ would be unable to fully carry out its role to protect public health.

OrganicFarmNZ urges FSANZ to abandon the proposal for all of the above reasons.

Signed by the OFNZ National Coordinating Committee on behalf of their members



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HOW to submit? Free-form submission, or via the FSANZ consultation hub
[<https://consultations.foodstandards.gov.au/fsanz/p1055/>](https://consultations.foodstandards.gov.au/fsanz/p1055/) which has set questions? Several good links on S&H website here [<https://soilandhealth.org.nz/blog/2024/09/05/sh-submission-on-p1055-definitions-for-gene-technology-and-new-breeding-techniques/>](https://soilandhealth.org.nz/blog/2024/09/05/sh-submission-on-p1055-definitions-for-gene-technology-and-new-breeding-techniques/).