

SUBMISSION ON

Proposal P1055 - Definitions for gene technology and new breeding techniques

10 September 2024

To: Food Standards

Name of Submitter: Horticulture New Zealand

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OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Submission

Our submission

Horticulture New Zealand (HortNZ) thanks FSANZ for the opportunity to submit on Proposal P1055 - Definitions for gene technology and new breeding techniques and welcomes any opportunity to continue to work with FSANZ and to discuss our submission.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

HortNZ's Role

Background to HortNZ

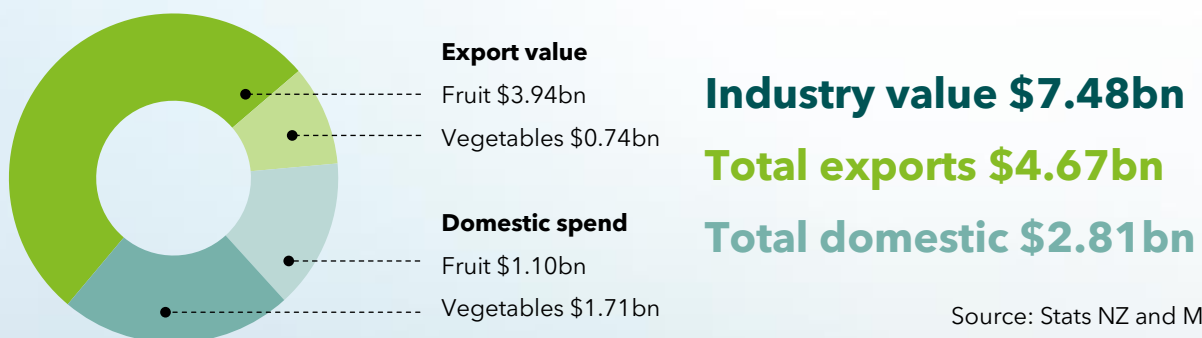
HortNZ represents the interests of approximately 4,200 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

There are approximately 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain, and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



Submission

1. Definitions for gene technology and new breeding techniques

HortNZ represents growers of fruit and vegetables. New Zealand growers are interested in the definitions for gene technology and new breeding techniques that will apply to all foods sold in New Zealand and Australia.

At the current time, HortNZ is unwilling to provide specific comment on the proposed change in definitions in the Food Standards that apply to Australia and New Zealand. This is because HortNZ is in the process of consulting with growers about the proposed changes to the regulation of gene technology in New Zealand.

HortNZ has not yet completed our consultation process, and therefore we do not consider it appropriate to comment on this FSANZ consultation at the current time, even though we acknowledge these consultations are for different purposes.

We can, however, offer these broad comments:

- As the FSANZ definitions apply to food safety regulation, we consider it appropriate the definitions are only concerned with food safety risk.
- We support New Zealand and Australia having the same definitions for the purposes of food safety, under the Australia New Zealand Food Standards Code.
- We do not consider it is necessary for the Australia New Zealand Food Standards Code to adopt the same definition of genetically modified organisms, gene technology and new breeding techniques, as is used in other regulation such as the New Zealand HSNO Act, proposed Gene Technology Bill or the Australian Gene Technology Act, as these laws regulate matters broader than food safety.