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Submitted to **Public Consultation- Scoping Paper on the Review of the Food Standards Australia New Zealand Act 1991**

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What sector do you represent?

Drop down list about which sector the respondent represents:

Food industry

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What is your organisation?

Organisation:

Horticulture New Zealand

Which country are you responding from?

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New Zealand

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An opportunity to provide any other information about your organisation.:

Horticulture New Zealand (HortNZ) advocates for and represents the interests of New Zealand's 6,000 commercial fruit and vegetable growers. The horticulture industry is currently valued at \$6.39b, with over \$4.2b in exports annually.

The industry employs over 60,000 people, occupies ~130,000 hectares of land and provides critical regional development opportunities in Northland, Auckland, Bay of Plenty, Waikato, Hawke's Bay, Gisborne, Manawatu, Marlborough, Nelson, Canterbury, and Central Otago.

New Zealand growers supply the majority of fresh and processed fruit and vegetables to domestic consumers, as well as exporting crops to discerning consumers in 130 countries.

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Discussion questions - Objectives

1a Is there still a case for regulating food?

Is there still a case for regulating food? :

Yes. There is a case for regulating food to establish an effective framework for the provision of safe and suitable food for consumers domestically and overseas.

1b What market failure(s) should governments seek to address through regulation of food?

What market failure(s) should governments seek to address through regulation of food?:

Inconsistency between requirements for food imports, domestic consumption, and exports

Any food which is not subject to market requirements, or somehow fall through the cracks pose a potential risk to public safety and credibility of the food safety system.

2 Are there other significant focus areas that should be considered as part of the Review?

Are there other significant focus areas that should be considered as part of the Review?:

Yes. Consideration should be given to widening defining the scope to a broader 'Food Policy' similar to EU- public health, sustainability, quality etc. with input of expertise and resources from other regulatory bodies. While food safety is the focus, there currently are a range of misaligned policies currently regulating our food system, which leads to disintegration at the implementation stage, confusion, increased compliance burden, increased compliance costs, and unintended consequences (e.g. reduction in availability or increase in price for safe and healthy food options).

To be truly focused on outcomes, policies will need to be integrated to promote integrated and efficient implementation of standards.

3 To what degree are the current legislated objectives an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?

To what degree are the current legislated objectives an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?:

Unsure of any issues associate with the current objectives. Suggest that 'quality' is out of scope unless scope is widened further. If remaining with a focused scope then it probably should be confined to food safety and public health.

4a What would be the impact of implementing "Reform idea 1 – Define 'public health' and 'safety' in legislation to affirm the inclusion of long-term health and nutrition as a core objective", and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Reform idea 1 will pull the short and long-term objectives apart, and separate safety from nutrition.

Horticulture New Zealand supports the short-term objective of protecting public safety via continued adoption and improvement of good hygiene and safety practices in the food system.

Horticulture New Zealand also supports the long-term objective of protecting public health, by enabling and promoting consumption of fruit and vegetables in Australia and New Zealand where up 47% of people do not meet recommended daily vegetable intake (Ministry of Health 2019).

The benefits of fruit and vegetable consumption are well established, particularly their role in preventing general micronutrient-deficiencies and chronic diseases (Moore, Barton, & Young, 2019). Low fruit and vegetable intake are identified as a leading risk factor in loss of health. In New Zealand, having a high body mass index (i.e. being overweight or obese) has overtaken tobacco as a leading cause in health loss (Ministry of Health, 2013). The Institute for Health Metrics and Evaluation (IHME) carry out the Global Burden of Disease study. This study attempts to quantify the health loss due to various diseases and risks. The study estimated that almost 800 deaths were caused by low vegetable intake in New Zealand in 2017, as well as quality of life lost due to morbidity (IHME, 2017).

The price of meeting micronutrient requirements is very expensive in New Zealand compared to other countries. Without changing the land use the situation is unlikely to get better and could get worse (Moore, Barton, & Young, 2019).

Affordability is a key factor in why people eat less than the recommended intake of fruit and vegetables. If fruit and vegetable growing cannot expand to meet the growing demand with an increased population, the reduced availability of vegetables and an increased price would impact on the health of the most vulnerable people (Moore, Barton, & Young, 2019).

Higher food prices don't affect everyone equally; generally low-income households have a stronger response to changes in cost. Healthier food has been the first essential that low income families compromise in times of economic hardship, exacerbating existing nutritional deficiencies resulting from general lack of money (Cheer, Kearns, & Murphy, 2002).

In New Zealand, for families living in deprived areas, increases in fruit and vegetable prices especially around their off-season, compel them to substitute the purchase of healthier whole fruit and vegetables with cheap energy-dense and nutrient-poor products (Rush, Savila, Jalili-Moghaddam, & Amoah, 2018).

A 2019 Ministry of Health study has analysed household food insecurity among children in New Zealand, (Ministry of Health, 2019). 174,000 (19%) children in NZ are estimated to live in food insecure households. When considering just the children in food insecure households, almost two-thirds lived in the two most deprived quintiles of neighbourhoods (Quintiles 4 and 5: 63.3%) (Ministry of Health, 2013).

There is an extensive body of research indicating that children experiencing household food insecurity have lower fruit and vegetable intake, diets higher in fat, and are at an increased risk of obesity (Ministry of Health, 2019).

Local vegetable production may provide a pseudo-subsidy through increased access to seasonal discounts and holding transports costs down. This would have long term public health benefits (Moore, Barton, & Young, 2019).

To deliver on this objective, the production of fruit and vegetables needs to be enabled with effect given to the FSANZ Act objectives when regulators develop policy relating to food production (e.g. environmental, social).

The regulatory environment for producing food is becoming increasingly complex, onerous, and costly for producers. Each area is generally regulated in isolation including implementation meaning a complicated and disaggregated system at farm and processor level with many overlapping, non-complimentary and sometimes contradictory compliance requirements.

Horticulture New Zealand supports development of a common food policy which sets safe, healthy and sustainable food as the core objective and a central policy to which other policies can refer and connect if required.

In our view food policy should be informed by a mātauranga Māori framework that includes the concepts of kaitiakitanga and manaakitanga, recognizing food provides for sustenance of mind, body and wairua.

Works Cited:

- McWha, V., Li, W., & Moore, D. (2019). Review of Food Security Policies. Sapere.
- Ministry of Health. (2013). Health loss in New Zealand survey 1990 - 2013.
- Ministry of Health. (2019). Household food insecurity among children, New Zealand Health Survey.
- Moore, D., Barton, B., & Young, M. (2019). The value of local vegetable production. Sapere.
- Plant and Food. (2018). Fresh Facts.

4b What would be the impact of implementing "Reform idea 2 - Recognise trade as a core goal and reframe consumer choice as a factor to which FSANZ 'must have regard' ", and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Otherwise

and provide details about the impacts (positive and negative) that this would have:

Positives:

- the need for standards to be based on a risk analysis and best scientific evidence
- promotion of consistency between domestic and international food standards

Potential negatives:

-information required relating to food to enable consumers to make informed choice. How far does this go? Safety and 'Health Star' rating are in scope, but what about Sustainability, country of origin etc. The word 'information' is too broad so recommend defining the scope of this.

Should 'quality' be a goal of the FSANZ Act? This is likely out of scope as it is effectively driven by consumers and markets

Should 'fair trade' be a goal of the FSANZ Act? This is likely out of scope, with (b) the promotion of consistency having a positive impact on this

4c What would be the impact of implementing of implementing "Reform idea 3 – Establish criteria in the Act that the Forum must meet to request a review of a draft regulatory measure", and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Will mean that there are defined criteria that will trigger a review of the Act

5 Are there other potential issues or solutions relating to legislated objectives?

Are there other potential issues or solutions relating to legislated objectives?:

no comment

Discussion questions - Functions

6 To what degree are FSANZ's functions (as currently stated in the Act) an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?

To what degree are FSANZ's functions (as currently stated in the Act) an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?:

As outlined in the scoping document, issues include:

- ambiguity around FSANZ's role in healthy eating and healthy food supply
- Whether FSANZ should have a role in developing prescriptive standards which could be left to private standards and industry groups where needed (e.g. primary production and processing requirements for high risk horticulture)

7a What would be the impact of implementing "Reform idea 4 - Amend the Act to better reflect the functions FSANZ currently delivers, particularly as they relate to supporting long-term health and nutrition" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

- support conducting research that contributes to evidence relating to long term health and nutrition benefits
- support coordination of food safety incidents, but will require clarity on where it has this responsibility (e.g. Australia), and clarity on FSANZ's role in collaboration with other stakeholders
- support providing assistance to industry applications for development of regulation

7b What would be the impact of implementing "Reform idea 5 – Amend s 13 of the Act to reflect a broader range of functions that FSANZ could deliver now and in the future" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Negative

and provide details about the impacts (positive and negative) that this would have:

Uncertain about benefits of FSANZ having a role in operational functions, unless as a conduit between regions or establishing framework for others operating in the operational space.

Uncertain about benefits of FSANZ coordinating food safety research, unless as a platform to collaborate, and to share existing and future research outcomes

8 Are there other potential solutions relating to FSANZ's statutory functions?

Are there other potential solutions relating to FSANZ's statutory functions?:

no comment

Discussion questions - Legislative processes and decision-making arrangements

9 To what degree are the current processes for strategically reviewing standards an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?

To what degree are the current processes for strategically reviewing standards an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?:

No specific examples of issues, but support a more strategic approach to review of standards, rather than the current reactive approach

10a What would be the impact of implementing "Reform idea 6 – Remove exemption of food standards from sunset arrangements" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Negative

and provide details about the impacts (positive and negative) that this would have:

Do not believe that removal of exemption is required for food standards to be subject to regular review. The requirement for regular review could be incorporated into the Act. This would encourage regular and strategic review of standards rather than reactive review due to sunset.

10b What would be the impact of implementing "Reform idea 7 – Resource FSANZ to undertake regular, more holistic reviews of food standards" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

In general, more regular and holistic review of standards is a beneficial approach (e.g. agile), however there are limits to the benefits. Long-term standards provide certainty, and have much lower associated development and implementation costs. The holistic approach needs to consider the cost-benefit of reviews and needs to provide structure and certainty to stakeholders that overly regular reviews do not.

11 Are there other potential solutions relating to the timing of reviews of food standards?

Are there other potential solutions relating to the timing of reviews of food standards?:

Timing really depends on whether FSANZ is intending to be proactive or reactive.

12 To what degree are the current statutory application and proposal processes an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?

To what degree are the current statutory application and proposal processes an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?:

No specific comments

13a What would be the impact of implementing "Reform idea 8 – Reframe legislation to support more agile, risk-based processes" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support the reframing of legislation to support more agile, risk-based processes and decision making. Establishing a hierarchy of legislation and development processes based on risk will better align resources and level of detail with the appropriate level of process for development

13b What would be the impact of implementing "Reform idea 9 – Redefine the decision-making arrangements to support timelier and more efficient sign-off of regulatory measures" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support proposed decision-making arrangements to better align decision making with level of risk to make approval processes more efficient

14 Are there other potential solutions relating to streamlining current legislative process to develop or vary regulatory measures?

Are there other potential solutions relating to streamlining current legislative process to develop or vary regulatory measures?:

No comment

15 To what degree is the current approach to using only applications and proposals to develop or vary food standards an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?

To what degree is the current approach to using only applications and proposals to develop or vary food standards an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?:

No comment

16a What would be the impact of implementing "Reform idea 10 – Provide for FSANZ to adopt or accept risk assessments from overseas jurisdictions" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support adoption of overseas risks assessments to reduce duplication, but caution that this should be on a case by case basis as many will not have been tested in ANZ conditions. Suggest that overseas risk assessments are accepted then tailored to ANZ requirements. Support limiting to specific credible overseas bodies.

16b What would be the impact of implementing "Reform idea 11 – Enable FSANZ to adopt international standards" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support adoption of international standards, once again to improve efficiency and timeliness plus reduce duplication. Similar to risk assessments, it is important that these standards are relevant and tailored to ANZ as required.

16c What would be the impact of implementing "Reform idea 12 – Create industry-led pathways to expedite applications and bring new products to market" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support creating streamlined industry-led pathways for bringing new products to market. This will encourage development of new products, diversification, and ultimately achieve better and more timely outcomes with increased industry ownership over market development opportunities

17 Are there other potential solutions relating to additional pathways to develop or vary food regulatory measures?

Are there other potential solutions relating to additional pathways to develop or vary food regulatory measures?:

No comment

Discussion questions - Partnerships

18 To what degree is the current alignment between policy development and standards setting an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?

To what degree is the current alignment between policy development and standards setting an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?:

As mentioned in the scoping paper, there seems to be a mis-alignment of roles, responsibilities and processes at all levels. In horticulture this means mis-alignment of the roles and responsibilities of FSANZ, MPI, and private standards like Freshcare, NZGAP and GLOBALG.A.P. (Good Agricultural Practice) in development and implementation of standards. This leads to confusion for all, especially producers and operators who are trying to implement and comply with the relevant food safety standards.

19a What would be the impact of implementing "Reform idea 13 – Facilitate joint agenda setting between FSANZ and the Forum" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Sounds like a sensible approach to improving collaboration and alignment thus reducing the sometimes conflicting priorities.

19b What would be the impact of implementing "Reform idea 14 – Amend statutory timeframes to support more strategic prioritisation of work" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support. Though there are statutory timeframes, these should be amendable if deemed lower priority via prioritisation processes agreed between FSANZ and the Forum.

20 Are there other potential solutions relating to agreeing system priorities between FSANZ and the Forum?

Are there other potential solutions relating to agreeing system priorities between FSANZ and the Forum?:

Suggest establishing a prioritisation matrix and decision tree. All projects and proposals should be to this matrix and decision tree with periodic (e.g. quarterly) review. This could flow on to the amendment of timeframes as required to focus on priority projects

21 To what degree does inconsistent interpretation of food standards present an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?

To what degree does inconsistent interpretation of food standards present an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?:

Suggest that it creates an issue with inconsistent implementation of standards, and increased compliance costs including advisory services. Increased compliance costs are also associated with demonstrating and communicating compliance to someone with a different interpretation. In horticulture growers face this issue with both markets and regulators though they already comply with both via their private standard food safety audit.

22a What would be the impact of implementing "Reform idea 15 – Enhance FSANZ's role in providing guidance about food standards within its current statutory remit" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support including a statement of intent to explain the 'why'. To establish standards that are based on outcomes, the intent and objectives have to be clearly defined and explained.

Unsure to what extent FSANZ intends to update and maintain industry guidelines, and if this is likely out of scope. If industry led it could increase alignment and understanding between FSANZ and industry for more consistent interpretation and implementation of standards, with reduced advisory/consultancy costs associated with multiple industry groups and businesses developing these independently.

22b What would be the impact of implementing "Reform idea 16 – Provide for FSANZ to give binding interpretive advice on food standards" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Compliance codes may be useful in some circumstances, and binding interpretations are likely to reduce compliance, enforcement and legal costs overall due to FSANZ being the 'one source of truth' which is credible and legally binding.

This does however appear to broaden the scope of FSANZ considerably into implementation which may cause resourcing and potential duplication issues.

22c What would be the impact of implementing "Reform idea 17 – Enhance FSANZ's regulatory role by providing limited enforcement powers" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support more consistent and centralised enforcement across Australian states, and for trade between NZ and Australia, to improve efficiencies, alignment and reduce compliance and enforcement costs.

23 Are there other potential issues or solutions relating to interpretation of food standards?

Are there other potential issues or solutions relating to interpretation of food standards?:

No comment

24a To what degree is the food-medicine interface an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?

To what degree is the food-medicine interface an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?:

Horticulture New Zealand is well aware of the current issues with conflicting policy objectives between environment, social, cultural, and economics. Given policies and regulations are generally focused in one area, it is often extremely difficult to come to integrated and holistic policy solutions that achieves the best possible outcome. Regulations are also becoming more prescriptive including detailed processes which are often at odds with other regulations making implementation almost impossible for businesses. The problem with integrating these policies is that the policy development process becomes more complicated and resource intensive in the short-term. The primary benefit is that implementation becomes simplified and streamlined thus greater outcomes are achieved.

When it comes to fruit and vegetables, food is medicine especially in the long-term so Horticulture New Zealand is supportive of policy which gives all New Zealanders and all Australians access to a variety of safe, sustainable, healthy, nutritious and affordable food.

24b To what degree is the oversight of health claims an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?

To what degree is the oversight of health claims an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?:

Health claims are an issue for many products, especially those with an associated premium including manuka honey and extra virgin olive oil.

Support evidence based health claims, and establishment of standards which must be met before a claim can be made (e.g. on a label)

The horticulture industry considers fresh fruit and vegetables should be automatically given a health star rating of 5, which is currently not the case. To ensure consumers are aware of the health benefits of fresh fruit and vegetables it's critical they recognize their associated health status.

25a What would be the impact of implementing "Reform idea 18 – Focus efforts on improving the food-medicine interface through regulatory practice" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support

25b What would be the impact of implementing "Reform idea 19 – Broaden the role of FSANZ to assess general level health claims" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support FSANZ establishing standards for health claims, but suggest that FSANZ does not necessarily have a role in assessing health claims which could be done via accredited laboratories or certification schemes.

Support FSANZ having a role in enforcement if issues with fraud become prevalent.

25c What would be the impact of implementing "Reform idea 20 – Align definitions and powers in legislation between therapeutic goods and foods" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support alignment between therapeutic goods and food where beneficial to improve consistency between requirements for the same product.

26 Are there other potential solutions relating to improving the food-medicine interface?

Are there other potential solutions relating to improving the food-medicine interface?:

No comment

Discussion questions - Operations

27 To what degree are FSANZ's governance arrangements an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?

To what degree are FSANZ's governance arrangements an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?:

No comment

28a What would be the impact of implementing "Reform idea 21 – Streamline Board appointments and nominations" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support. Suggest having option for the board to appoint one position directly. This will assist in covering any identified capability gaps among the already nominated and appointed members.

28b What would be the impact of implementing "Reform idea 22 – Establish minimum term length for Board members" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support. Suggest establishing a minimum 2-year term to ensure consistency and reduce the frequency of lengthy nomination and appointment processes.

28c What would be the impact of implementing "Reform idea 23 – Reduce Board size" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support reduction of board size to optimize decision making processes, but understand that broad representation may become a problem. Expertise gaps may be filled with the board appointed position suggested in 28b.

29 Are there other potential solutions relating to FSANZ's governance arrangements?

Are there other potential solutions relating to FSANZ's governance arrangements?:

No comment

30 To what degree does FSANZ's approach to setting its own workplan and resourcing its work present an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?

To what degree does FSANZ's approach to setting its own workplan and resourcing its work present an issue for the system? What are the types of problems that different stakeholder groups face as a consequence?:

No comment

31a What would be the impact of implementing "Reform idea 24 – Expand scope of applications for which FSANZ can recover costs" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Negative

and provide details about the impacts (positive and negative) that this would have:

Appears to provide minimal benefit while penalising businesses who are likely least able to afford the additional costs

31b What would be the impact of implementing "Reform idea 25 – Provide for limited expansion of scope of activities for which FSANZ can recover costs" and how could the outcome best be achieved?

Please advise the net impact of implementing the reform idea above:

Positive

and provide details about the impacts (positive and negative) that this would have:

Support FSANZ recovering costs for services such as pre-application advice above a defined introductory threshold

32 Are there other potential solutions relating to FSANZ's operations?

Are there other potential solutions relating to FSANZ's operations?:

No comment

Discussion questions - Key reflections

33 What are the top 2-3 most pressing issues to resolve through change to the Act and associated operations and responsibilities of FSANZ?

What are the top 2-3 most pressing issues to resolve through change to the Act and associated operations and responsibilities of FSANZ?:

1. Defining the scope of the review and the interface with short and long-term health outcomes
2. Defining the scope of FSANZ responsibilities
3. Increasing consistency across all Australian states and trade between New Zealand and Australia

34 Are there key issues or challenges related to FSANZ and the Act that are not represented in this scoping paper?

Are there key issues or challenges related to FSANZ and the Act that are not represented in this scoping paper?:

No comment

35 What other reform ideas should be considered to address the issues identified in the paper, assuming no resource constraints?

What other reform ideas should be considered to address the issues identified in the paper, assuming no resource constraints?:

In a similar vein to health, consideration should be given to an even broader 'food policy' approach similar to current developments in the European Union. This approach puts food water at the centre of the policy and aims to integrate multiple outcomes including health, social, environmental and economic outcomes.

The definition of food security has experienced a substantial evolution over a period of decades, moving from a supply-focused concept, mostly related to food availability, to a multidimensional notion that also considers food accessibility, food utilisation and food stability.

One regularly cited definition of food security was defined at the World Food Summit in 1996 by the Food and Agriculture Organisation (FAO, 2016) and is stated: "Food security is achieved when all people at all times have physical and economic access to sufficient, safe and nutritious food to meet dietary needs and food preferences for an active and healthy life".

This definition of food security encompasses the five key pillars of availability, accessibility, acceptability, adequacy and stability (PMSEIC, 2011). These are defined as:

- Availability – Sufficient supply of food for all people at all times,
- Accessibility – Also referred to as equality of access to food; this describes the idea of physical and economic access to food at all times,
- Acceptability – Access to culturally acceptable food which is produced and obtained in ways that do not compromise people's dignity, self-respect or human rights,
- Adequacy – Access to food that is nutritious, safe, and produced in environmentally sustainable ways, and
- Stability - Reliability of food supply.

Nations will prioritise different dimensions of food security to reflect their social, economic, geographic, historic and cultural experience and goals

New Zealand's food policy has tended towards self-reliance, and exporting products we have a comparative advantage in and importing other products.

New Zealand has also been relatively self-sufficient for fresh vegetables and fruit, while importing mainly canned and frozen vegetables, and out of season fruit. Due to New Zealand's isolation, we are unlikely to be able import sufficient fresh vegetables to replace locally grown vegetables, if due to urban or water policy, fresh vegetables growing cannot expand to meet the demand of New Zealanders in the future.

A movement towards increased food self-sufficiency could be beneficial for New Zealand's food security, given the potential impacts that increased food prices could have on disadvantaged parts of society. Increased domestic production of horticulture, particularly in a variety of different crops, could improve the nation's ability to feed itself and make it less dependent on imports. It would also be less susceptible to a single crop failure from disease or biosecurity incursion

Increased domestic horticultural production could also support New Zealand's ability to be food self-reliant. If New Zealand is able to increase the quantity and quality of crops in which it has a comparative advantage (such as kiwifruit or apples), then this could drive higher income from exports. This would enable an increased variety of foods to be imported that can serve the country's food security agenda.

While the objectives of increased food self-sufficiency and food self-reliance may seem in opposition to each other, this would only be the case if the domestic production sector remained static. A more diverse and productive domestic food sector would likely help serve both goals and improve the overall level of food security in New Zealand. To achieve these goals, domestic production must be strategic and informed, responding to consumer trends internationally, as well as the stability and accessibility of food for New Zealanders

Works Cited:

FAO. (2016). Rome Declaration on World Security.

PMSEIC. (2011). Australia and Food Security in a Changing World.