

05 February 2024

Project Manager

Food Standards Australia New Zealand

PO Box 5423

KINGSTON ACT 2604

AUSTRALIA

RE: Submission – A1269 – Cultured Quail as a novel food [273-23]

Thank you for the opportunity to provide input to the Call for Submissions for A1269.

Following are the comments that AIFST wishes to present on the Application.

If you require any further information, please do not hesitate to contact me.

Sincerely

Fiona Fleming

B. App Sc (Food Tech); MNutr Mgt; FAIFST

Chief Executive Officer



Call for submissions – A1269 – Cultured quail as a novel food [273-23]

Submission by:

Australian Institute of Food Science & Technology
Limited (AIFST)

05 February 2024

The Australian Institute of Food Science and Technology Limited (AIFST)

The Australian Institute of Food Science and Technology Limited (AIFST) is a not-for-profit organisation representing food industry professionals working in all facets of the agrifood industry including food science, food technology, engineering, sensory, new product development, innovation, regulatory, QA, nutrition, microbiology, and food safety, as well as those in leadership positions within the academic, industry and private sectors.

AIFST's mission is to advance and inspire all food sector professionals through education, collaboration, and recognition, to champion a robust, innovative, science-based Australian agri-food industry to meet future food needs.

Food science is at the heart of what we do, and we aim to champion food science and food scientists.

Overall Comments

AIFST has reviewed the Call for Submissions documents including the four supporting documents provided.

AIFST notes the application is requesting an amendment to the Australia New Zealand Food Standards Code (the Code) to allow the use of cultured quail made with embryonic fibroblasts from *Coturnix japonica* (Japanese quail), as a novel food ingredient in food products.

AIFST commend the work that FSANZ has put into assessing this application, especially because it relates to a developing area of food science globally and is likewise challenging other regulatory bodies around the world.

AIFST notes FSANZ has undertaken a hazard and risk assessment of cultured quail cells, considering microbiology, biotechnology, toxicology, nutrition, and dietary intake/exposure considerations, concluding:

- The cell line is genetically stable and microbiological hazards associated with cell line sourcing are very low.
- There are no safety concerns from exposure to the substances used in the production process at the estimated consumption levels.
- The harvested cells are unlikely to pose a food allergenicity concern for the general population.
- There were no nutritional risks identified from the consumption of the harvested cells containing the levels of nutrients provided in the application, particularly given consumption is likely to be infrequent.

AIFST welcomes FSANZ's overall finding – *'The assessment concluded that no public health and safety concerns are associated with permitting harvested quail cells as a novel food ingredient.'*

AIFST position

AIFST **supports** the proposed regulation of the Vow cultured quail cells as a novel food according to the provisions of the Code and in line with international regulations (WHO 2023).

AIFST **supports** the need for the development of new definition for cell-cultured foods.

AIFST **does not support** FSANZ's proposal to mandate a single qualifying term nor FSANZ's preference for the term 'cell-cultured' for either the food name or the statement of ingredients.

AIFST **does not support** the need to specify in the 'Conditions of use' for the food to be produced under a food safety program.

Specific Comments

Proposed definition

AIFST notes FSANZ's proposal to prepare a draft variation to the Code for the second round of consultation, which would include a new definition for cell-cultured food.

The AIFST will make comments in relation to labelling when FSANZ prepares a draft variation at CFS2.

Conditions of use

Food businesses in Australia must comply with the Food Safety Standards in Chapter 3 of the Code. These include general food safety requirements for people, premises, equipment, and processes. A food business may also be required to develop and implement a documented food safety program to demonstrate how they will manage food safety risks (see Standard 3.2.1).

The requirement for *'food must be produced under a food safety program in accordance with Standard 3.2.1 of the Code'* is unnecessary duplication.

Labelling

AIFST supports FSANZ's position that:

- If the food for sale is not represented as a quail food product—apply the existing food name requirements.
- If the food for sale is represented as a quail food product—in addition to generic food name requirements, that a qualifying term be required.

AIFST **does not support** FSANZ's proposal to mandate a single qualifying term nor FSANZ's preference for the term 'cell-cultured' for either the food name or the statement of ingredients.

AIFST considers it is too early in the sector's development to mandate a single term.

AIFST **supports** the term 'cultivated' for products developed using cellular agriculture but submits that 'cultivated,' 'cell-cultivated,' 'cultured,' and 'cell-cultured' should all be deemed acceptable.

Recommendations

Creation of a regulatory pathway for cell-cultured food

The AIFST understands that FSANZ intends to take a case-by-case approach when assessing foods produced using cell-cultured foods.

AIFST supports the recommendation by the Australian Food and Grocery Council that FSANZ develop a broader and robust principal-based standard providing confidence in the regulatory safeguards governing research and development, release, and labelling of cell-cultured products. Such regulations aim to protect public health and safety and the environment, and at the same time foster a climate conducive to innovation and independent commercial decisions.

Future review

Being new technology, but in a rapidly developing area, we recommend that no matter when approval is granted, that after a short period of time (we suggest 5 years), a review of the approval be made taking into consideration the further information that is likely to be available. This is in line with good Quality Assurance practice, i.e. increased surveillance initially to identify unexpected issues, then later relaxation as positive reputation is developed.

This review should be in a number of areas:

Technology

Being new technology, there is likely to be ongoing development and while the current process should be approved, that does not necessarily apply to any future developments.

Terminology

The supporting information on the use of terms cites a number of studies, but these appear not to represent a broad section of the communities in which they were conducted.

Regulation

As parallel regulation is developed in other jurisdictions, FSANZ needs to remain abreast of those developments as there are likely to be applications from other companies and stakeholders working in similar fields which may influence further regulatory developments.