

Food Regulatory System- Horizon scan- Summary of stakeholder engagement

Background

In December 2021, Food Ministers agreed to develop and deploy a new, inclusive, transparent strategic planning process. This work was a key action under the Food Regulatory System (FRS) reform and modernisation agenda (Priority 3 of the FRS workplan). A triennial strategic planning process was proposed, which would involve close stakeholder engagement to ensure the key activities of the FRS were aligned to stakeholder expectation.

The strategic planning process has involved two key activities – A public consultation which centred around a ‘Horizon Scanning’ document and 3 key consultation questions, undertaken between June and August 2022, and an online stakeholder forum held in July 2022.

This summary document provides an overview of the feedback heard across both consultation opportunities.

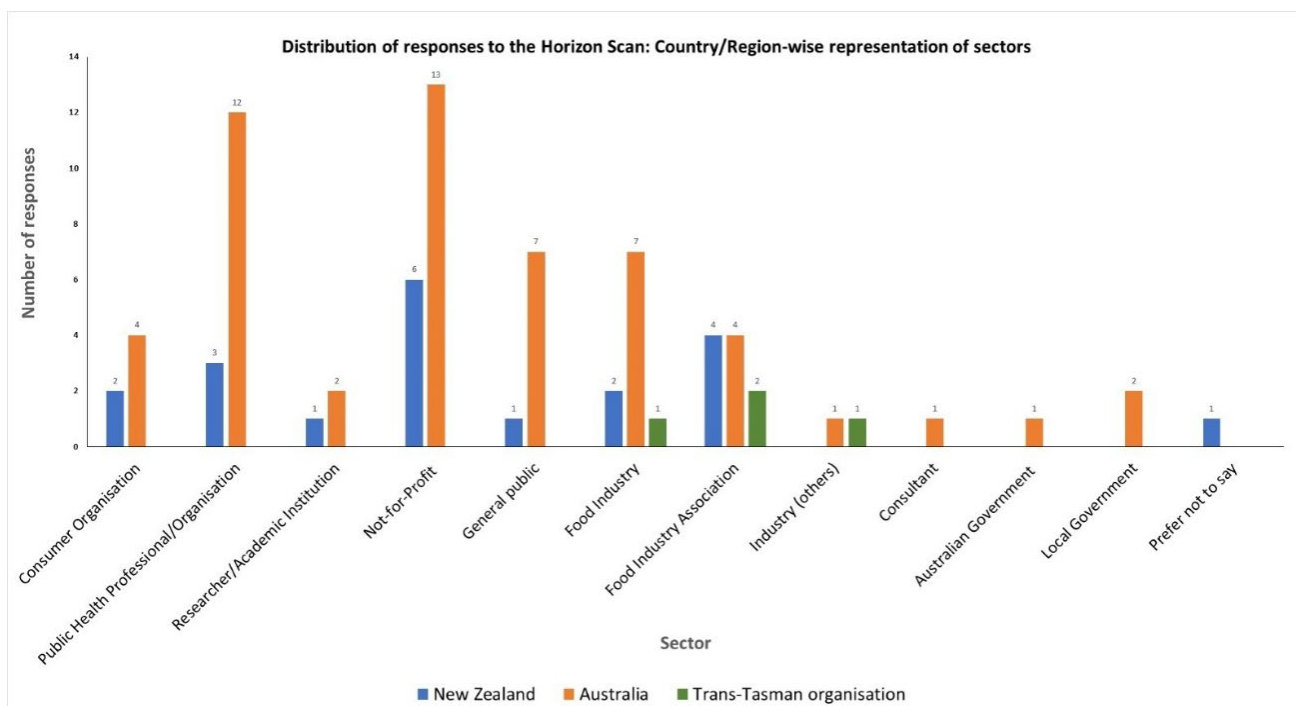
Horizon scan public consultation

From 26 June to 11 Aug 2022, the Australia New Zealand Food Regulation System (the System) launched a public consultation on the *Horizon Scan to support the strategic direction of the binational food regulatory system for 2023-2026*.

- The Horizon Scan did not focus directly on the FRS but instead took a broad view of the food system and included a (non-exhaustive) list of key challenges and opportunities. In addition, comments were invited on potentially missing topics, risks, and opportunities. A copy of the document can be found here: [Horizon scan 26 June 2022_Final.pdf \(health.gov.au\)](#)

Submissions

79 submissions were received. The key demographics of the respondents are summarised in the graph and text below:



- The following sectors were represented in the consultation submissions:
 - consumers
 - public health
 - academia
 - not-for-profit
 - food industry
 - local, state, territory and national government(s).
- 57 responses from Australian organisations, 18 responses from New Zealand organisations and 4 responses were received from Trans-Tasman organisations.

Responses

The horizon scan consultation document sought to capture the trends, issues, risks and opportunities across the food system. Respondents were asked whether they felt the consultation accurately captured these elements. 77% of the respondents felt that these elements **were not** accurately captured in the horizon scan consultation document.

The word cloud below provides a visual representation of the additional trends, issues, risks and opportunities that respondents reported should be considered (in addition to those featured within the horizon scan consultation document).



Key themes:

Strong themes presented in stakeholder consultation included the following:

1. *Public Health*

Many stakeholders advocated for increased consideration be given to long term public health and diet related chronic disease when decisions are being made within the FRS. Additionally stakeholders advocated for increasing action to help combat diet related chronic disease. Proposed mechanisms were broad and referenced food access, labelling, marketing and pricing.

Some stakeholders advocated for a food and nutrition policy in Australia. It is noted that this is currently being pursued as an action under the National Preventive Health Strategy.

2. *System Operations and Collaboration*

Many stakeholders advocated for increased transparency and accountability within the FRS and increased engagement with external stakeholders. Recommendations for increased engagement were broad and included increased engagement across Government agencies and between the FRS and external stakeholders (including public health, food industry and consumer stakeholders).

3. *Agility of the FRS*

In alignment with current work underway under Priority 3 – System Modernisation and the review of *FSANZ Act*, many stakeholders advocated for increasing agility within the FRS. This was referenced in relation to risk proportionate regulation, supply chain shocks and ensuring regulation can keep pace with innovation.

Some comments were received regarding the role and operations of FSANZ. Suggestions included ensuring adequate oversight and governance for FSANZ in relation to food industry relations, ensuring collaboration with interfacing regulatory bodies such as the TGA and ensuring adequate communications with stakeholders.

4. *Environmental Sustainability*

The role of the food system in environmental sustainability was highlighted in many submissions. Food sustainability was a theme presented by some stakeholders for consideration. This theme was broad in nature and covered concepts including:

- Impacts of climate change on future food supply
- Considering food and nutrition from a broader perspective that considers health, environment, development and infrastructure.
- Environmental sustainability in the context of food security
- Environmental ecosystem considerations.

5. *Food Safety*

Some stakeholders reiterated the importance of food safety as a core responsibility of the FRS. Stakeholders explained that the references to food safety within the consultation paper were limited, given the framing around global megatrends. Stakeholder emphasised the current success with food safety within the FRS whilst highlighting its ongoing importance.

6. *Other suggestions*

Other items suggested by a small number of respondents included:

- Consideration of the food information available to consumers purchasing food from online platforms
- Definition of novel foods
- Genetically modified foods
- Monitoring of maximum residue limits.

Out of scope:

Several submissions suggested pieces of work which currently sit beyond the scope of the FRS or require close overlap with interfacing regulatory systems and policy programs. For example work regarding food security food affordability, consumer values issues and labelling schemes.

Identified limitations of public consultation:

- There was significant stakeholder confusion on the purpose of the horizon scan and how it links to the Strategic plan. Instead of being accepted as context, the inclusion of the megatrends may have detracted from the purpose of this consultation paper.
- Some of the megatrends fell outside of the scope of the FRS and were therefore not relevant to this consultation, and may have contributed to the responses which included suggestions for actions which sit beyond the scope of the FRS.

Stakeholder Workshop

As part of a broader public consultation process, a Food Regulatory System Stakeholder Forum, titled '*System in Transition*', was held on 19 July 2022. The 1-day forum was externally facilitated and delivered online via Zoom. The forum was intended to provide stakeholders with updates on priority work and contribute to the broader strategic planning consultation (as outlined above).

The aims of the Forum were:

- A timely opportunity to reset and 'dust off', after unprecedented recent years, ready to set a new optimistic course for the System
- Stakeholders are informed and have a clear sense of what's happening in the System
- Stakeholders understand their active and important role in shaping the future System by contributing and testing ideas with peers
- Stakeholders are energised by the opportunities presented by the new strategic planning process and are empowered to make a submission via the public consultation process.

Participants:

131 participants attended. Demographic details were collected at registration and were as follows:

Sector:

- 57% Industry
- 26% Public Health
- 10% Government/regulators
- 7% public/possible consumer.

Geographic location:

- 33% New South Wales
- 21% Victoria
- 15% New Zealand
- 13% Australian Capital Territory
- 8% Queensland
- 4% Tasmania
- 3% Western Australia
- 2% Northern Territory
- 2% South Australia

The forum was centred around the horizon scan consultation report (as outlined above) and largely centred around the global megatrends. Additional sessions were included which provided an overview of the current priorities and associated work underway. Participants were encouraged to share their individual and/or organisational perspectives on how the global megatrends may influence their work, now and into the future.

Key themes:

Strong themes from the stakeholder forum included the following:

1. *Consumer education and preferences*

Consumer education, expectation and preferences were strongly featured throughout the workshop. Discussion referenced changing consumer expectation and how this relates to food labelling, food marketing and promotions. Many participants commented on the importance of food labelling as a form of consumer education. Broader forms of consumer education were also seen as valuable opportunities.

2. *Agility of the FRS and system collaboration*

Many varied topics were raised by participants which broadly relate to the operations, agility and collaborative mechanisms currently being utilised within the FRS. Topics raised included agility to take risk proportionate approaches; use of data and research in the system; interactions and relations with interfacing systems, including the TGA; trade interactions; conflict of interest considerations and methods for collaboration.

3. *Environmental sustainability and food waste*

Many participants highlighted the need for environmental sustainability consideration to be built into the FRS. Environmental sustainability was referenced in a number of ways, including:

- protecting biodiversity
- effective use of natural resources
- definitions of sustainability
- waste management, including from both an environmental sustainability and food security perspective.

4. *Food and nutrition and health*

The relationship between diet and health was heavily considered, in reference to both foodborne illness and diet-related chronic disease. Ensuring adequate access to appropriate, nutritious foods was considered from both a health and environmental perspective. There were comments regarding the need to focus on dietary patterns, rather than individual nutrients or foods, and the need to consider the broader food environment and food culture. Elements that were considered, however to a lesser extent, included requirements for health claims and defining health foods.

5. *Sale of food via electronic or digital means*

The Global Megatrend ‘Virtually Here’ highlights the digital environment in which we now live. This prompted a number of discussions regarding the regulation of foods for sale via digital means.

6. *Food security*

Food security was considered from environmental sustainability and waste, health and nutritional adequacy and equity perspectives.

7. *Supply chain vulnerabilities*

The need for regulatory flexibility alongside risk assessment was highlighted by some participants.

8. *Other suggestions*

- A smaller number of participants advocated for the need for a National Nutrition Policy document.