



To: Food Standards Australia New Zealand

Submission to the First Call for Comment on Permitting the use of Cultured Quail as a Novel Food

WePlanet Australia

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About Us

WePlanet Australia was founded in 2022 and is an eco humanist organisation that seeks to promote public policy which will help address a range of social and environmental issues including climate change, biodiversity loss and poverty.

Our organisation is the Australian chapter of WePlanet, a global network of citizen movements with the goal to liberate nature and elevate humanity.



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WePlanet Australia thanks FSANZ for the opportunity to comment on cultured quail as a novel food, and thanks FSANZ for its hard work and courage in undertaking a Major Procedure to assess this food, the first-of-a-kind in this jurisdiction.

WePlanet Australia strongly supports the proposal to permit the use of cultured quail cells as a novel food ingredient.

We support the conditions as proposed, with one exception: it is not clear to us why the proposal includes the condition that the cell-cultured quail be mixed with other foods—even if that is how the product is intended to be offered (section 2.2.7. in the Call for Submissions). However, it is better that the application proceeds with this condition in place than not proceed at all, if deemed appropriate by FSANZ and the wider community.

We welcome the finding that FSANZ’s assessment of cell-cultured quail identified a risk profile comparable to existing foods. This thorough assessment will provide not only a blueprint for, but also confidence in, future assessments of novel cell-cultured foods.

Our position

- WePlanet Australia values protection and restoration of ecosystems.
- WePlanet Australia values animal welfare.
- More than half of the Australian continent is used for animal agriculture, primarily cattle grazing. Alternatives that supply equivalent nutrition while using less land should be investigated.
- Factory farming and feedlots use less land but increase animal suffering.
- Compared to animal meat, cell-cultured meats offer similar nutrition with lower land use; and expected lower greenhouse gas emissions (especially methane), lower water use, and electrification of energy inputs (robust life-cycle assessments are ongoing).
- Growth in the cell-cultured meat market will help us better measure the environmental impact of these foods more precisely.
- Consumers being able to choose cell-cultured meat instead of animal meat will bring animal welfare benefits and environmental benefits.



Regarding various points in the assessment:

Contamination Risk

Given the novelty of the product, it seems a formidable task to define the safe parameters within which the product must fall.

The controlled environment in which cell-cultured food is produced potentially provides greater control over and safety of the product compared to conventional (animal) meat, which is subject to the health status of individual animals.

The microbiological analyses provided by Vow Group (section B.4.1 of the dossier)—including for mycoplasma and viruses—appear to be appropriate, and a reasonable analogue to veterinary health checks for animals to be slaughtered for meat.

RECOMMENDATION:

Regular and documented testing for contamination, as well as holding a sound plan for decontamination, may be appropriate inclusions in the Food Safety Program for a cell-cultured meat production facility.

It is worth noting that cell culture processes are incentivised to be sterile, given the risk of ruining the entire contents of a vessel through the introduction of a single viable bacterium. It is intuitive that the greatest contamination risk is post-harvest, when the cell-cultured food is exposed to the same hazards as any other food.

Labelling

Labelling should be, first and foremost, informative. It should use the terms most familiar or identifiable to consumers, rather than expecting consumers to learn a new vocabulary to interpret labels.

While the Asia-Pacific cellular agriculture community supports “cultivated” meat as its preferred term (as noted in section 3.1.3 of Supporting document 4), “cultured” meat is listed as an acceptable alternative. Ideally, foods from Australia and New Zealand will be able to use the same labelling as other jurisdictions, to limit confusion.

RECOMMENDATION:

Regarding labelling, proceed with the proposed terminology “cell-cultured quail”, or otherwise “cell-cultivated quail” or very similar.



Public Awareness

The undertaking of an online survey provides confidence that current attitudes of the Australian and New Zealand public have been taken into account. The forthcoming literature review to be conducted by the University of Adelaide provides greater confidence again.

RECOMMENDATION:

As cellular agriculture is an emerging field, the Consumer Insights Tracker (CIT) online survey should be repeated in coming years, as public awareness of cellular agriculture grows.

Proposed definition

It would be prudent to future-proof the definition of cell-cultured foods (as far as we can see into a dynamic future) by using a suitably broad definition, like the one given in section 2.2.5 of the Call for Submissions: *“certain types of cells, or a combination of cell types, with or without other components such as fats or scaffold”*.

RECOMMENDATION:

The definition for cell-cultured foods should be broad enough to not exclude any components found in conventional (animal) meat or meat flesh, as defined by the current code.

Consideration of costs and benefits

The assessment greatly understates the benefits to society of making cell-cultured foods available. Development of these foods sits firmly in the realm of public benefit, due to:

- Reduction in animal suffering
- Reduction in agricultural land use
- Increase in food diversity
- Expected reduction in greenhouse gas emissions
- Expected reduction in zoonotic diseases
- Expected reduction in foodborne diseases
- Expected increase in food security



The availability of cell-cultured food fundamentally changes the way humans relate to the world around us. To date, human nutrition has depended in part on eating animal products, and meat dishes as cultural staples are widespread.

Animal farming requires much land, water, and nutritional inputs, and creates wastes in volume. Cell-cultured food represents the decoupling of meat consumption from these heavy demands on the environment, and from animal slaughter.

Consumer Choice

The Call for Submissions states, “consumers may have marginally increased choice of foods” (section 2.5.1.1).

While this application relates to only a single food product, that product belongs to a completely new category of food. The outcome of this assessment will pave the way for all other foods of its type in Australia and New Zealand, and provide a point of reference for other jurisdictions. For the growing proportion of the community that seeks to limit their consumption of animal products on account of religious, environmental or animal welfare concerns, development of this new food category represents a very significant expansion of consumer choice.

Industry

Section 2.5.1.1 of the Call for Submissions understates the benefit to industry by noting only the lack of commercial risk (due to entry into the market being voluntary). Approval of this product will make a new category of food available to producers. It is however noted in section 2.5.3 that “*Providing permission for the Vow cultured quail cells could help foster continued innovation and improvements*” in the industry.

WePlanet Australia believes that significant economic opportunities would be foregone if the cell-cultivated meat market was held back rather than intelligently regulated. Australia and New Zealand are trusted suppliers of high-quality food, and international markets are looking for options with lower environmental impact.

RECOMMENDATION:

Ensure regulatory language is harmonised between jurisdictions as much as possible, to reduce barriers to Australia and New Zealand thriving in this emerging global market.



Conclusion

WePlanet Australia reiterates its support for permitting the use of cultured quail cells as a novel food ingredient.

It takes courage to be one of the first entities to commit to regulating a new food rather than to maintain the status quo. We commend FSANZ for properly considering the risks and benefits of moving forward versus the risk of doing nothing.

Australia also has a responsibility—and almost unrivalled ability—to join global leaders in this undertaking, given its long history of agricultural innovation, biotechnology breakthroughs, and world-class food safety.

Acknowledgements

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Thank you for the
opportunity to provide
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important issue

This submission does not need to be kept
confidential and may be published.

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