

Public Consultation - Review of the Food Standards Australia New Zealand Act Draft Impact Analysis

Overview

In **November 2019** <<https://foodregulation.gov.au/internet/fr/publishing.nsf/Content/forum-communique-2019-November>> , the **Australia and New Zealand Ministerial Forum on Food Regulation (Forum)** <<https://foodregulation.gov.au/internet/fr/publishing.nsf/Content/Forum>> endorsed an ambitious plan to reform the Bi-national Food Regulation System to ensure it remains strong, robust and agile into the future. A key element underpinning the reform agenda is the review of the *Food Standards Australia New Zealand Act 1991* (FSANZ Act).

The FSANZ Act Review commenced in July 2020, and is a comprehensive examination of the effectiveness of the FSANZ Act and the associated operations and responsibilities of Food Standards Australia New Zealand (FSANZ). The FSANZ Act is Australian legislation and underpins the Australia New Zealand Joint Food Regulatory System within which New Zealand participates as a partner under the bilateral Food Treaty.

Extensive stakeholder consultation has been undertaken to date, including public consultation on a Scoping Paper across October and November 2020, draft Regulatory Impact Statement in April to May 2021, and targeted workshops with key government, industry, public health and consumer bodies in 2021 and 2023.

Current engagement

Through this work, the FSANZ Act Review has identified 27 concepts across four themes for further investigation. These concepts have been consolidated into 20 components in the Impact Analysis due to alignment of several concepts and for easier analysis.

The Impact Analysis outlines the cumulative costs and benefits of these components. Each of the 20 components are being considered individually, and it is expected that the final proposal considered by Food Ministers will be a combination of different components within the four themes. The overall cost benefit will depend on components considered.

The Impact Analysis poses two options for consideration:

- **Option 1:** Retain the status quo
- **Option 2:** Modernise regulatory settings

Option 2 is comprised of four themes:

- **Theme 1 – Purpose and Objectives:** Providing greater clarity on the purpose and objectives of FSANZ.
- **Theme 2 – Reforming Standard settings:** Supporting more efficient and effective processes to develop food regulatory measures, with risk being the key driver of process.
- **Theme 3 – Efficient and Effective Operations:** Focused on better use of FSANZ's limited resources through more effective governance, as well as achieving financial sustainability for the organisation.
- **Theme 4 – Improving System Agility:** Aimed at making the food regulatory system better integrated, streamlined, and evidence informed.

Stakeholders are being asked for their views on the Impact Analysis and to provide feedback to characterise the impact of the proposed concepts.

It should be noted that the options are presented without prejudice and do not represent agreed positions of any government in Australia and New Zealand. The data, commentary and information received through this consultation will be analysed to inform a final Impact Analysis, which will be used to inform any amendments to the FSANZ Act.

Why your views matter

The Australian and New Zealand joint food regulation system is a strong system, based on scientific evidence and expertise, that protects the health and safety of consumers. It is a complex system that involves all levels of the Australian and New Zealand governments.

The FSANZ Act Review is focused on the underpinning legislation of FSANZ and the subsequent functions and operations of FSANZ. Broader issues within the food environment, food regulation systems or government food policy are not within scope of the review.

Stakeholder submissions to this consultation will be used by the Department of Health and Aged Care to inform the final Impact Analysis.

The final report from the FSANZ Act Review will be provided to the Australian Government Minister responsible for FSANZ, who will consider the report/review in partnership with the New Zealand Minister for Food Safety and state and territory food ministers through the Australia and New Zealand Food Ministers' Meeting.

Responding to the consultation

Download and read the Public Consultation Impact Analysis (available under the 'Related' section at the bottom of this page).

Respond to the questions in the online survey – the questions in the survey match the questions in the Public Consultation Impact Analysis. A preview of the survey is available for download under the 'Related' section at the bottom of this page.

Please provide evidence or examples to support your comments where possible.

It is not necessary to provide a response to all questions. There are 20 components being considered as part of this consultation and each concept has multiple questions. Please answer the questions that are relevant to your areas of interest or concern.

All submissions are subject to the **Freedom of Information Act 1982** <<https://www.legislation.gov.au/C2004A02562/latest/text>> in Australia and the **Official Information Act 1982** <<https://www.legislation.govt.nz/act/public/1982/0156/latest/DLM64785.html>> in New Zealand. If you consider that all or part of your submission should not be released, please make this clear when making your submission and indicate the grounds for withholding the information.

Introduction

The consultation is broken down by the sections within the Impact Analysis. Respondents are welcome to provide feedback on some or all sections or components within this package. The consultation is question heavy to try and ascertain as much information to inform the Impact Analysis and the refinement of the components going forward.

Respondents are strongly encouraged to read to the Impact Analysis prior to completing this survey. Page numbers are provided in the survey to assist in finding related information but are not exhaustive. The page numbers relate to the numbers on the bottom of the page, not the PDF page number.

You will be able to save your responses and return to the survey later to complete it, if required.

Responding to each section or component being considered in the Impact Analysis is not mandatory.

Have you read the Impact Analysis?

(Required)

Please select only one item

- Yes
 No

Demographics

What is your full name?

Full name *(Required)*

Are you answering on behalf of an organisation?

(Required)

Please select only one item

- Yes
 No

What is the name of your organisation?

Organisation name:

Which sector do you represent?

(Required)

Please select only one item

- Public Health
 Food Industry
 Government
 Consumer Organisation
 Research/Academic
 Individual (member of the public)
 Other (please specify)
 Prefer not to say

Other:

What country are you responding from?

(Required)

Please select only one item

- Australia
- New Zealand
- Trans-Tasman organisation
- Other (please specify)
- Prefer not to say

Other:

If we require further information in relation to this submission, can we contact you?

(Required)

Please select only one item

- Yes
- No

What is your email address?

Email address:

Section 3 - The problems to solve

This section refers to questions in *Section 3 - The Problem to Solve* within the Impact Analysis, commencing on Page 20.

Section 3 - The problems to solve (Methodology)

What are the issues with the current methodology? How should it be improved? Please provide justification.

Free text box, no character limit

Are there other methodologies or evidence that the Impact Analysis should consider?

Free text box, no character limit

Section 3 - The problems to solve (Ratings)

The questions on this page refer to the ratings listed in the Impact Analysis from page 30.

Are the ratings assigned to each of the sub-problems and ultimately the problem appropriate?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Which rating(s) do you believe is inappropriately rated? What would be a fair rating for the problem? Please provide justification. (Free text)

Free text box, no character limit

Section 5 - Options for reform

This section refers to questions in *Section 5 - Options for reform* within the Impact Analysis, commencing on Page 44.

Component 2.1

Component 2.1 relates to the *Purpose and objectives of FSANZ*. This section contains questions for Components 2.1.1 to 2.1.3 on pages 49 to 50.

Component 2.1.1

Component 2.1.1 | The definition of 'protection of public health and safety' within the Act could be clarified to be in line with the current policy guidance (Page 49)

Would amending Section 3 and 18 of the Act to include a definition of public health and safety reduce confusion about how FSANZ considers short and long-term risks to health when developing food standards?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Additional comments (optional)

Do you anticipate that this clarification could materially impact the way that FSANZ approaches applications and proposals and the factors to which they give regard?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Additional comments (optional)

What would be the impact of clarifying the definition of 'protection of public health and safety' within the Act?

Please select only one item

- Positive
- Neutral
- Negative
- Prefer not to respond / I don't know

Additional comments (optional)

Component 2.1.2

Component 2.1.2 | There could be greater clarity around how ministerial policy guidance is reflected in the development of food standards (Page 49)

Would revising the way FSANZ communicates its consideration of Ministerial Policy Guidance in developing food regulatory measures support greater transparency in the development of food regulatory measures?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

How could the consideration of Ministerial Policy Guidance in the development of food regulatory measures be effectively communicated?

Free text box, no character limit

Component 2.1.3

Component 2.1.3 | Language within the Act could be updated to be more culturally inclusive (page 50)

Would new provisions and/or language changes in the Act better support FSANZ to recognise Indigenous culture and expertise?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

What provisions or language changes could be included in the Act to promote recognition of Indigenous culture and expertise?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Component 2.1

Are there other initiatives that should be considered in Component 2.1?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Component 2.2

Component 2.2 relates to *Reform standing-setting*. This section contains questions for Components 2.2.1 to 2.2.6 on pages 51 to 56.

Component 2.2.1

Component 2.2.1 | A risk-based framework and approach could be introduced to guide the development of food regulatory measures (Page 51)

Would the introduction of a risk-based framework support FSANZ to be flexible and proportionate in handling of changes to the Food Standards Code?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

What criterion and/or evidence should be used to form the basis of a risk framework?

Free text box, no character limit

What would be the impact of introducing a risk-based framework to guide development of food regulatory measures for you?

Please select only one item

- Positive
- Neutral
- Negative
- Prefer not to answer / I don't know

Free text box, no character limit

Component 2.2.2

Component 2.2.2 | New pathways to amend food standards could be introduced (Page 52)

Would enabling FSANZ to accept risk assessments from international jurisdictions support FSANZ to exercise risk-based and proportionate handling of applications and proposals? How so?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Would enabling (but not compelling) FSANZ to automatically recognise appropriate international standards support more risk-based and proportionate handling of applications and proposals and improve efficiency and effectiveness? How so?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Would introducing a minimal check pathway for very low risk products help FSANZ exercise risk-based and proportionate handling of applications and proposals and improve efficiency and effectiveness?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Would introducing principles in legislation to allow FSANZ to create other pathways to amend food standards help FSANZ exercise risk-based and proportionate handling of applications and proposals?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

What would be the impact of introducing new pathways to amend food standards for you?

Please select only one item

- Positive
- Neutral
- Negative
- Prefer not to respond / I don't know

Free text box, no character limit

Are there other opportunities relating to new pathways to amend food standards that should be considered?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Component 2.2.3

Component 2.2.3 | Decision-making arrangements could be streamlined (Page 54)

Would increasing opportunities for decision making arrangements to be delegated support FSANZ to be more flexible and efficient? How so?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

What factors should be considered when determining the level of risk for decision-making arrangements?

Free text box, no character limit

What would be the impact of streamlining decision-making arrangements for you?

Please select only one item

- Positive
- Neutral
- Negative
- Prefer not to respond / I don't know

Free text box, no character limit

What expertise should be considered when determining the delegation of decisions to an alternative person?

Free text box, no character limit

Component 2.2.4

Component 2.2.4 | Legislative change and greater guidance material could support bringing more traditional foods to market (Page 55)

Would a one-off investment of time and resources to develop and publish a list of traditional foods or ingredients that have undergone nutritional and compositional assessments facilitate entry of traditional foods to market?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Would the development of further guidance materials on how traditional foods can be assessed for safety facilitate entry of traditional foods to market? How so?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Component 2.2.5

Component 2.2.5 | FSANZ can be resourced to undertake more timely, holistic and regular reviews of standards (Page 55)

Would resourcing FSANZ to undertake more timely, holistic and regular reviews of standards allow FSANZ to be more strategic and consistent in changes to food standards?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Are there other initiatives that should be considered to drive more holistic consideration of food standards?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Component 2.2.6

Component 2.2.6 | Codes of Practice and guidelines could be increasingly used to complement food standards (Page 56)

Would the use of Codes of Practice and guidelines better support the implementation of the Food Standards Code and help to address issues that do not warrant the time and resources required to develop or vary a standard?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Can you provide an example of an issue that would have been/be better solved by a Code of Practice or guideline?

Free text box, no character limit

How could the decision pathway for the development of a Code of Practice or guideline be incorporated into the risk framework outlined in Component 2.2.1?

Free text box, no character limit

What would be the expected impact if Codes of Practice and guidelines were developed for industry, by industry?

Please select only one item

- Positive
- Neutral
- Negative
- Prefer not to respond / I don't know

Free text box, no character limit

Component 2.2

Are there other initiatives that should be considered in Component 2.2?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Component 2.3

Component 2.3 relates to *Efficient and Effective operations*. This section contains questions for Components 2.3.1 to 2.3.4 on pages 57 to 62.

Component 2.3.1

Component 2.3.1 | Outstanding recommendations from the 2014 review of the FSANZ Board could be implemented (Page 58)

Would amending the compositional requirements of the FSANZ Board increase flexibility and reflect contemporary governance processes?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Would amending the nomination process for the FSANZ Board to be an open market process increase efficiency and support a better board skill mix?

Please select only one item

- Yes
- No
- Prefer not to answer / I don't know

Free text box, no character limit

Component 2.3.2

Component 2.3.2 | The expedited approvals pathway could be removed to address workload prioritisation (Page 59)

What would be the expected impact of removing the option for applications to be expedited?

Please select only one item

- Positive
- Neutral
- Negative
- Prefer not to respond / I don't know

Free text box, no character limit

Component 2.3.3

Component 2.3.3 | To generate more sustainable revenue, cost recovery could be expanded for work that benefits industry (Page 59)

What would be the expected impact of the implementation of an industry-wide levy?

Please select only one item

- Positive
- Neutral
- Negative
- Prefer not to respond / I don't know

Free text box, no character limit

How could eligibility criteria for a levy be set so that it is fair, consistent and feasible to administer?

Free text box, no character limit

What do you think could be an acceptable range for a levy rate? Please provide your response in Australian Dollars.

Free text box, no character limit

What would be the expected impact of compulsory fees for all applications?

Please select only one item

- Positive
- Neutral
- Negative
- Prefer not to respond / I don't know

Free text box, no character limit

Are there specific entrepreneurial activities that FSANZ should be considering charging for to build up a more sustainable funding base?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Component 2.3.4

Component 2.3.4 | Some services could also be cost recovered from government agencies (Page 61)

Would imposing a food recall coordination levy imposition contribute to a more sustainable funding base and support FSANZ to rebalance its workload priorities by addressing resourcing pressures? How so?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

How could eligibility criteria for a levy be set so that it is fair, consistent and feasible to administer?

Free text box, no character limit

Would charging jurisdictions to add additional proposal or project work to FSANZ's workplan meaningfully support FSANZ to rebalance its workload priorities by addressing resourcing pressures? How so?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

What would be the expected impact of imposing a food recall coordination levy on jurisdictions?

Please select only one item

- Positive
- Neutral
- Negative
- Prefer not to respond / I don't know

Free text box, no character limit

How would this need to be implemented to be successful?

Free text box, no character limit

Would it be better to charge a levy per recall, or an annual levy?

Please select only one item

- Per recall
- Annual Levy
- Other

Free text box, no character limit

What would be the expected impact of charging jurisdictions a fee to add additional proposal work to FSANZ's workplan?

Please select only one item

- Positive
- Neutral
- Negative
- Prefer not to respond / I don't know

Free text box, no character limit

How would this need to be implemented to be successful?

Free text box, no character limit

Component 2.3

Are there other initiatives that should be considered in Component 2.3?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Component 2.4

Component 2.4 relates to *Improving system agility*. This section contains questions for Components 2.4.1 to 2.4.7 on pages 62 to 66.

Component 2.4.1

Component 2.4.1 | Mechanisms to enable FSANZ and FMM to undertake periodic joint agenda-setting could be implemented (Page 63)

Related information

FMM - Food Ministers' Meeting

Would establishing mechanisms to enable FSANZ and FMM to undertake periodic joint agenda setting lead to a shared vision of system priorities?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

How would this need to be implemented to be successful?

Free text box, no character limit

What factors should be considered as part of the joint prioritisation matrix?

Free text box, no character limit

In what ways could FSANZ and FMM work together in a more coordinated way?

Free text box, no character limit

Component 2.4.2

Component 2.4.2 | FSANZ could engage earlier and more systematically with FRSC and jurisdictions in the development of food standards (Page 63)

Related information

FMM - Food Ministers' Meeting

FRSC - Food Regulation Standing Committee

Would more routine engagement between FSANZ and the FRSC reduce duplication of effort and missed opportunities to manage risk? How so?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

What approaches could be used to improve collaboration between FSANZ, the FRSC, and the FMM?

Free text box, no character limit

Component 2.4.3

Component 2.4.3 | FSANZ could take guardianship over key food safety databases (Australia only) (Page 64)

Would FSANZ assuming a role as a database custodian for Australia meaningfully improve intelligence sharing across the regulatory system? How so?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

What types of data would be most useful for FSANZ to curate?

Free text box, no character limit

Component 2.4.4

Component 2.4.4 | Further work could be done to establish information sharing arrangements with international partners (Page 64)

Would establishing information sharing arrangements with international partners reduce duplication of effort and missed opportunities to manage risk?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

What should be the focus of such information sharing arrangements?

Free text box, no character limit

Component 2.4.5

Component 2.4.5 | Statements of intent could be introduced into the Food Standards Code to assist with interpretation and enforcement (Page 65)

Would introducing Statements of Intent into food standards meaningfully improve consistent interpretation and enforcement of food standards? How so?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

What should a Statement of Intent include to benefit industry and enforcement agencies to understand and consistently apply food standards?

Free text box, no character limit

Component 2.4.6

Component 2.4.6 | FSANZ could be resourced to develop, update and maintain industry guidelines to guide interpretation of food standards (Page 65)

Would FSANZ being resourced to develop, update and maintain industry guidelines improve consistent interpretation and enforcement of food standards? How so?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Would amending the Act to allow FSANZ to develop guidelines in consultation with First Nations or Māori peoples support cultural considerations being taken into account in the food standards process?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Component 2.4.7

Component 2.4.7 | FSANZ could collaborate more regularly with jurisdictional enforcement agencies (Page 66)

Would FSANZ collaborating with jurisdictional enforcement agencies improve inconsistent interpretation and enforcement of food standards?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Component 2.4

Are there other initiatives that should be considered in Component 2.4?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Section 6 - Net Benefit

This section refers to questions in *Section 6 - Net benefit* within the Impact Analysis, commencing on page 68.

Section 6 - Net Benefit (Option 1)

The questions on this page refer to the information in Option 1 in the Impact Analysis from page 69.

Are there other costs and benefits that have not yet been qualified or quantified?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

What are the growth expectations of the First Nations and Māori food sector?

Free text box, no character limit

What are the current delay costs to industry?

Free text box, no character limit

Do you have any additional data that would be useful in characterising the costs and benefits of current regulatory settings?

Please select only one item

- Yes
- No

Free text box, no character limit

Any other comments regarding the Option 1 information in the Net Benefit section?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Section 6 - Net Benefit (Option 2)

The questions on this page refer to the information in Option 2 in the Impact Analysis from page 72.

Are there other costs and benefits for different stakeholders that have not yet been qualified? What are they?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Do you have any additional data that would be useful to characterising the costs and benefits of proposed initiatives?

Please select only one item

- Yes
- No

Free text box, no character limit

Any other comments regarding the Option 2 information in the Net Benefit section?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Section 8 - Best option and implementation

This section refers to questions in *Section 8 - Best option and implementation* within the Impact Analysis, commencing on Page 87.

Section 8 - Best option and implementation (Solving policy problems)

The questions on this page refer to the extent to which options solve the policy problems in the Impact Analysis from page 89.

Does the approach to assessing the degree to which an option solves a policy problem make sense? How so?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Is the rating assigned to each of the sub-problems appropriate? If not, why?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Section 8 - Best option and implementation (Delivery risks)

The questions on this page refer to the delivery risk in the Impact Analysis from page 94.

Do you think the delivery risks have been appropriately identified and categorised within the Impact Analysis?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Are the delivery risk ratings assigned to each of the sub-problems appropriate?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Section 9 - Evaluation of the preferred option

This section refers to questions in *Section 9 - Evaluation of the preferred option* within the Impact Analysis, commencing on Page 104.

Are there any other factors that should be captured in a future evaluation?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Other comments

Is there anything else you want to share with us on the Impact Analysis?

Please select only one item

- Yes
- No
- Prefer not to respond / I don't know

Free text box, no character limit

Privacy and Confidentiality

Personal information provided to the Australian Government Department of Health and Aged Care as part of the FSANZ Act Review public consultation on the Impact Analysis will be dealt with in accordance with the [Privacy Act 1988](https://www.legislation.gov.au/Details/C2023C00347) <https://www.legislation.gov.au/Details/C2023C00347> at www.comlaw.gov.au <http://www.comlaw.gov.au> and the [Australian Privacy Principles](https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-quick-reference) <https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-quick-reference> at <http://www.oaic.gov.au> <http://www.oaic.gov.au> . The Department of Health and Aged Care's Privacy Policy is available at [Privacy Policy](https://www.health.gov.au/resources/publications/privacy-policy?language=en) <https://www.health.gov.au/resources/publications/privacy-policy?language=en> – Australian Government Department of Health and Aged Care.

Copyright and Confidentiality

Copyright in an original submission resides with the copyright owner of that submission, but the act of making a submission will grant the Australian Government and the New Zealand Government a licence to use the submission for the purpose of making a summary of the submission for website and for future policy or standard development work.

All submissions are subject to the [Freedom of Information Act 1982](https://www.legislation.gov.au/C2004A02562/latest/text) <https://www.legislation.gov.au/C2004A02562/latest/text> in Australia and the [Official Information Act 1982 in](https://www.legislation.govt.nz/act/public/1982/0156/latest/DLM64785.html) <https://www.legislation.govt.nz/act/public/1982/0156/latest/DLM64785.html> New Zealand, along with relevant Freedom of Information legislation in each of the States and Territories.

If you consider that all or part of your submissions should not be released, please indicate this below and indicate the grounds for withholding the information.

A request made under the *Freedom of Information Act 1982* in Australia and the *Official Information Act 1982* in New Zealand for access to a submission marked as confidential will be determined in accordance with that Act.

Do you want this submission to be treated as confidential?

(Required)

Please select only one item

- Yes. The entire submission is confidential
- Yes. Some parts of the submissions are confidential
- No.

If you want all or parts of this submission to be confidential, please state which parts and why.

Free text box, no character limit