

Introduction

Have you read the Impact Analysis?

Yes

Demographics

What is your full name?

Full name:  
Tim Budden

Are you answering on behalf of an organisation?

Yes

What is the name of your organisation?

Organisation name::  
Australian Dental and Oral Health Therapists Association

Which sector do you represent?

Other (please specify)

Other: :  
Professional Body

What country are you responding from?

Australia

Other: :

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

Yes

What is your email address?

Email address::  
[REDACTED]

Section 3 - The problems to solve

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)

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

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

### Component 2.1

#### Component 2.1.1

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?

Yes

Additional comments (optional):

Including a clear definition of "public health and safety" is likely to help reduce confusion. A precise definition would give stakeholders a better understanding of the scope and parameters within which FSANZ operates in safeguarding public health.

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?

Yes

Additional comments (optional):

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

Positive

Additional comments (optional):

There may be a number of impacts, including:

- enhanced regulatory clarity (stakeholders have a better understanding of FSANZ's mandate and objectives)
- improved risk assessment processes (determining which risks are relevant to public health and safety)
- greater accountability
- facilitated communication and collaboration (common understanding of the goals and priorities related to public health protection would promote more effective dialogue on food safety issues)
- support for evidence-based decision-making
- increased public confidence in food safety

#### Component 2.1.2

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?

Yes

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

Free text box, no character limit:

- Incorporate Ministerial Policy Guidance into public consultation processes conducted by FSANZ. This allows stakeholders, including industry representatives, consumer groups, health professionals, and the public, to provide input and feedback on how policy guidance is being considered in the development of food regulatory measures.
- Publish Ministerial Policy Guidance documents on government websites and other accessible platforms to ensure transparency and visibility. Clearly communicate how these guidance documents are intended to inform the development of food regulatory measures and how they align with broader policy objectives.
- Provide guidance on how Ministerial Policy Guidance should be interpreted and applied in the development of food regulatory measures. This may include specific criteria, principles, or decision-making frameworks that should be considered when drafting regulations or standards.
- Conduct targeted stakeholder engagement activities, such as workshops, forums, and webinars, to educate stakeholders about Ministerial Policy Guidance and its role in shaping food regulatory measures. Provide opportunities for dialogue and discussion to ensure that stakeholders understand the implications of the guidance and can provide informed input.
- Keep stakeholders informed about the status and progress of food regulatory measures that are being developed in consideration of Ministerial Policy Guidance.

- Document the consideration of Ministerial Policy Guidance in the development of food regulatory measures in reports, regulatory impact assessments, and other official documents. Clearly articulate how the guidance has influenced decision-making and the rationale behind regulatory choices.

- Establish feedback mechanisms to gather input from stakeholders on how effectively Ministerial Policy Guidance is being incorporated into the development of food regulatory measures. Use this feedback to identify areas for improvement and make adjustments as needed.

### Component 2.1.3

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

Yes

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?

Not Answered

Free text box, no character limit:

- FSANZ could explicitly acknowledge the value of Indigenous traditional knowledge related to food and nutrition. This could involve recognizing Indigenous food systems, traditional food practices, and the nutritional benefits of Indigenous foods.

- FSANZ could incorporate cultural considerations into its risk assessment processes. This may include recognizing Indigenous cultural practices related to food preparation, storage, and consumption, and considering how these practices may impact food safety and nutritional outcomes.

- FSANZ could establish mechanisms for meaningful consultation with Indigenous communities and stakeholders during the development of food standards and regulations. This would involve engaging with Indigenous representatives to seek their input, feedback, and perspectives on matters related to food safety, nutrition, and cultural considerations.

- FSANZ could incorporate Indigenous language and terminology into its documents, guidelines, and communications to promote cultural sensitivity and respect. This may involve using Indigenous language names for foods, incorporating Indigenous terminology related to food preparation and consumption, and providing translations of key documents into Indigenous languages where appropriate.

- FSANZ could ensure representation of Indigenous experts and representatives on its advisory committees and working groups. This would ensure that Indigenous perspectives are considered in the development of food standards and regulations and that Indigenous expertise is recognized and valued.

- FSANZ could recognize and support Indigenous food sovereignty, which encompasses the rights of Indigenous peoples to control their food systems, including access to traditional foods, land, and resources. This may involve developing policies and guidelines that support Indigenous food sovereignty and recognize the importance of Indigenous food systems to health and well-being.

### Component 2.1

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

No

Free text box, no character limit:

### Component 2.2

#### Component 2.2.1

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

Yes

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:

The risk framework should be based on robust scientific evidence, including data from epidemiological studies, laboratory analyses, risk assessments, and systematic reviews. This evidence should be relevant to the specific food safety or nutritional issues being addressed and should be of high quality and reliability.

- Identify potential hazards associated with changes to the Food Standards Code, including microbiological, chemical, and physical hazards. Consider

known hazards associated with similar foods or ingredients, as well as emerging hazards or novel food technologies.

- Assess the likely exposure of consumers to hazards associated with changes to the Food Standards Code. This may involve estimating dietary exposure levels, consumption patterns, and population demographics to determine the potential risk posed by specific foods or ingredients.
- Characterize the nature and severity of identified hazards, including their toxicological properties, dose-response relationships, and potential health effects. Consider factors such as the potency of toxins, the susceptibility of vulnerable populations, and the likelihood of adverse health outcomes.
- Integrate hazard identification, exposure assessment, and hazard characterization to conduct a comprehensive risk assessment. Evaluate the likelihood and severity of adverse health effects associated with changes to the Food Standards Code, taking into account uncertainties and variability in the data.
- Conduct a cost-benefit analysis to assess the potential economic, social, and health impacts of different risk management options. Evaluate the costs of implementing changes to the Food Standards Code against the expected benefits in terms of reduced risks to public health and safety.
- Engage with stakeholders, including industry representatives, consumer groups, public health organizations, and government agencies, throughout the risk assessment and risk management process. Seek input, feedback, and expert advice to ensure that the risk framework reflects diverse perspectives and considers relevant issues.
- Assess the administrative, compliance, and enforcement costs associated with implementing new regulations or standards.
- Ensure transparency and accountability throughout the risk assessment and risk management process. Document the criteria and evidence used to inform decision-making, communicate findings to stakeholders, and solicit feedback on proposed changes to the Food Standards Code.

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

Neutral

Free text box, no character limit:

### Component 2.2.2

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?

Yes

Free text box, no character limit:

Accepting risk assessments from international jurisdictions allows FSANZ to leverage the expertise and resources of other regulatory agencies with relevant experience and capabilities in risk assessment and management. By tapping into international best practices, scientific expertise, and risk assessment methodologies, FSANZ can benefit from a broader knowledge base and diverse perspectives in evaluating food safety risks.

Accepting risk assessments from international jurisdictions reduces the need for FSANZ to duplicate efforts in conducting its own risk assessments for every application or proposal. This streamlines the review process, saves time and resources, and avoids unnecessary duplication of work, enabling FSANZ to focus its resources on higher-priority activities and areas of greater risk.

Accepting risk assessments from international jurisdictions enables FSANZ to respond more quickly and effectively to emerging food safety risks or regulatory challenges. By leveraging pre-existing risk assessments or scientific evaluations from international partners, FSANZ can expedite the review process, accelerate decision-making, and implement appropriate risk management measures in a timely manner to protect public health.

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?

Yes

Free text box, no character limit:

- Recognizing international standards allows FSANZ to align its regulatory framework with global best practices, leveraging the expertise and experience of international organizations. By adopting internationally recognized standards, FSANZ can ensure that its regulations are based on the latest scientific evidence and consensus among experts worldwide.

- Automatic recognition of international standards can streamline the assessment process for applications and proposals related to food standards. FSANZ can reference existing international standards that have already undergone rigorous scientific review and consensus-building processes. This saves time and resources, allowing FSANZ to focus its efforts on areas where additional scrutiny or customization is needed.

- International standards are often developed using a risk-based approach, focusing on the identification and management of significant risks to human health and safety. By incorporating these standards into its regulatory framework, FSANZ can adopt a more consistent and systematic approach to risk assessment and management. This ensures that regulatory decisions are based on an objective evaluation of the likelihood and severity of potential risks.

- Automatic recognition of international standards enables FSANZ to apply a proportionate regulatory response to different food products and processes.

Instead of imposing burdensome regulatory requirements on all products, FSANZ can tailor its regulatory approach based on the level of risk posed by specific foods or ingredients. This promotes regulatory efficiency and minimizes unnecessary regulatory burdens on industry while still protecting public health and safety.

- Recognizing international standards facilitates global harmonisation of food regulations, promoting consistency and coherence across international markets. This benefits food producers, exporters, and consumers by reducing barriers to trade and enhancing market access for safe and compliant products. It also fosters international cooperation and collaboration in addressing shared challenges related to food safety and quality.

- Encourages collaboration and capacity building between FSANZ and other national and international regulatory agencies. By participating in international standard-setting processes, FSANZ can contribute its expertise and insights while also learning from the experiences of other jurisdictions. This exchange of knowledge and best practices strengthens FSANZ's regulatory capabilities and enhances its effectiveness in protecting public health and safety.

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?

Yes

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?

Yes

Free text box, no character limit:

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

Neutral

Free text box, no character limit:

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

Yes

Free text box, no character limit:

FSANZ could establish an expedited review process for minor amendments or updates to existing food standards that do not require extensive scientific assessment or stakeholder consultation. This would enable FSANZ to address minor issues or make routine updates more efficiently, without the need for lengthy regulatory procedures.

### Component 2.2.3

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

Yes

Free text box, no character limit:

Increasing opportunities for decision-making arrangements to be delegated may enhance FSANZ's flexibility, efficiency, and effectiveness in managing regulatory activities by streamlining decision-making processes, promoting agility and responsiveness, optimising resource allocation, leveraging expertise, engaging stakeholders, and managing risks more effectively.

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?

Neutral

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

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?

Yes

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?

Prefer not to respond / I don't know

Free text box, no character limit:

### Component 2.2.5

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?

Yes

Free text box, no character limit:

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

Yes

Free text box, no character limit:

Given ADOHTA is not an expert in this field, some broad initiatives that may be considered include:

FSANZ could adopt interdisciplinary approaches to food regulation, bringing together experts from diverse fields such as food science, nutrition, public health, environmental science, economics, and social sciences. This interdisciplinary approach would enable FSANZ to consider the broader implications of food standards on human health, environmental sustainability, economic development, and social equity.

FSANZ could incorporate lifecycle analysis into its assessment of food standards, considering the environmental, social, and economic impacts of food production, processing, distribution, consumption, and disposal. This holistic approach would help FSANZ identify opportunities to promote more sustainable food systems and mitigate negative externalities associated with food production and consumption.

FSANZ could engage with communities and stakeholders to ensure that their voices and perspectives are heard in the development of food standards. This could involve community consultations, citizen science initiatives, participatory decision-making processes, and community-led research projects to promote inclusivity, transparency, and accountability in food regulation.

FSANZ could prioritise health equity and social justice considerations in the development of food standards, addressing disparities in access to healthy and nutritious foods, and addressing social determinants of health such as income, education, and access to healthcare. This could involve adopting policies and interventions that promote equitable access to safe, affordable, and nutritious foods for all population groups, including vulnerable and marginalized communities.

FSANZ should recognise and incorporate cultural diversity and Indigenous knowledge into its consideration of food standards, respecting traditional food practices, cultural preferences, and Indigenous food systems. This could involve consulting with Indigenous communities, incorporating Indigenous perspectives into decision-making processes, and promoting the use of traditional and culturally appropriate foods in food standards.

FSANZ could address the challenges of climate change, globalisation, and other systemic risks to food security and nutrition by promoting resilience and adaptation in food systems. This could involve developing strategies to mitigate the impacts of climate change on food production, promoting local and regional food systems, and fostering innovation and adaptation in food production and distribution.

FSANZ could collaborate with international partners and organisations to harmonize food standards, share best practices, and address global challenges in food regulation.

### Component 2.2.6

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?

Yes

Free text box, no character limit:

Codes of Practice and guidelines offer flexibility in addressing specific issues or concerns without the need for formal amendments to the Food Standards Code. They can provide practical guidance and recommendations for industry stakeholders on how to comply with regulatory requirements, adapt to

emerging trends, or address specific challenges in food production, processing, or distribution.

Codes of Practice and guidelines can be developed and updated more quickly than formal amendments to the Food Standards Code. This allows regulatory agencies to respond promptly to emerging issues, new scientific evidence, or changes in industry practices without lengthy regulatory processes.

Developing and maintaining Codes of Practice and guidelines will generally require fewer resources compared to developing or varying standards in the Food Standards Code. This makes it more feasible for regulatory agencies to address minor or low-priority issues that may not justify the time and resources required for formal regulatory amendments.

Codes of Practice and guidelines provide valuable guidance and support to industry stakeholders, helping them understand and comply with regulatory requirements. By providing clear, practical recommendations, these documents can promote consistency and best practices across the food industry, enhancing food safety, quality, and compliance with regulatory standards.

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:

On 25 February 2024 new requirements for allergen labelling come into force as set out in Standard 1.2.3 and Schedule 9 of the Food Standards Code. These changes help people find allergen information on food labels more quickly and easily and allow them to make safe food choices. This could be quite confusing to navigate and understand.

Developing a Code of Practice or guideline specifically addressing the labeling of gluten-free products could help clarify labeling requirements, provide guidance on testing methods for gluten detection, and outline best practices for ensuring compliance with regulatory standards.

By providing clear, practical guidance on labeling requirements for gluten-free products, a Code of Practice or guideline could help promote consistency and transparency in labeling practices across the food industry.

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?

Positive

Free text box, no character limit:

## Component 2.2

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

No

Free text box, no character limit:

## Component 2.3

### Component 2.3.1

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

Yes

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?

Yes

Free text box, no character limit:

### Component 2.3.2

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

Prefer not to respond / I don't know

Free text box, no character limit:

### Component 2.3.3

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

Prefer not to respond / I don't know

Free text box, no character limit:

The following are more broad expectations of the impacts an industry-wide levy.

Positive impacts may include:

- a stable and reliable source of funding for regulatory activities, including food safety inspections, monitoring, enforcement, and research. This would ensure that regulatory agencies such as Food Standards Australia New Zealand (FSANZ) have the necessary resources to carry out their mandate effectively and efficiently.
- it can promote fairness and equity. This prevents a disproportionate burden from falling on individual businesses or sectors within the industry and ensures that all participants contribute to the costs of maintaining a safe and compliant food supply.
- spreads the financial burden across the entire industry. This can reduce the regulatory burden for individual businesses, particularly smaller businesses with limited resources.
- could create financial incentives for businesses to comply with food safety regulations. By linking levy payments to compliance with regulatory standards, businesses are motivated to invest in food safety measures and best practices to avoid penalties and maintain their reputation.

Negative impacts may include:

- some businesses within the industry may face increased costs of operation. This could be particularly challenging for smaller businesses or those operating on thin profit margins.
- certain sectors within the food industry may be disproportionately affected by an industry-wide levy, depending on factors such as their size, revenue, and level of regulatory compliance. This could create challenges for businesses in these sectors and potentially lead to market distortions.
- implementing and managing an industry-wide levy requires administrative resources and infrastructure. Businesses may incur additional administrative burden in complying with levy reporting and payment requirements, particularly if the levy is complex or involves multiple layers of bureaucracy.
- some businesses within the industry may oppose the implementation of an industry-wide levy. This could lead to resistance or lobbying efforts to oppose or modify the levy.

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:

Base eligibility criteria on clear and objective factors that are relevant to the purpose of the levy, such as business size, revenue, production volume, or market share.

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?

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?

Prefer not to respond / I don't know

Free text box, no character limit:

### Component 2.3.4

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?

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?

No

Free text box, no character limit:

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

Negative

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?

Per recall

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?

Negative

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?

No

Free text box, no character limit:

## Component 2.4

### Component 2.4.1

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

Yes

How would this need to be implemented to be successful?

Free text box, no character limit:

Define clear governance structures and processes for joint agenda setting, including roles, responsibilities, decision-making mechanisms, and communication channels between FSANZ and FMM. This ensures clarity and accountability in the joint agenda-setting process.

Engage stakeholders, including industry representatives, consumer groups, public health organizations, and other relevant parties, in the joint agenda-setting process. Solicit input, feedback, and perspectives from stakeholders to inform priorities and decisions.

Define clear objectives and criteria for prioritising system priorities, taking into account factors such as public health impact, regulatory effectiveness, stakeholder priorities, resource availability, and feasibility of implementation.

Foster collaboration and communication between FSANZ and FMM through regular meetings, workshops, working groups, and other forums for dialogue

and exchange of information. Establish mechanisms for sharing data, evidence, and insights to inform joint agenda setting.

Base decisions on an evidence-based approach, drawing on scientific evidence, data, research findings, and expert analysis to inform prioritization of system priorities. Ensure that decisions are grounded in robust evidence and analysis to maximize the effectiveness of the regulatory framework.

Regularly evaluate and review progress in implementing joint agenda-setting priorities, assessing outcomes, impacts, and effectiveness. Use feedback mechanisms to gather insights from stakeholders and make adjustments as needed to optimize outcomes.

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

Free text box, no character limit:

When developing a joint prioritization matrix it's important to consider a range of factors that reflect the diverse perspectives, priorities, and challenges within the food regulatory system. These factors should encompass various dimensions, including public health, food safety, regulatory effectiveness, stakeholder interests, and resource constraints. Key factors include:

- public health impact
- food safety risk
- regulatory effectiveness
- stakeholder Priorities
- emerging issues and trends
- resource availability
- legal and policy considerations
- community and consumer preferences
- international harmonisation and trade implications

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

Free text box, no character limit:

## Component 2.4.2

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

Yes

Free text box, no character limit:

Enhanced information sharing  
Improved coordination  
Early identification of issues  
Streamlined decision-making  
Optimised use of resources  
Enhanced stakeholder confidence

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

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

Yes

Free text box, no character limit:

FSANZ assuming a role as a database custodian for Australia could significantly improve intelligence sharing across the regulatory system by:

- providing a centralised platform for data management,
- promoting collaboration and coordination among regulatory agencies,
- enhancing risk assessment and management capabilities,
- facilitating timely alerts and notifications,
- enhancing transparency and accountability, and
- optimizing resource utilisation.

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

Free text box, no character limit:

Food safety incidents  
Regulatory compliance data  
Product and ingredient information  
Nutritional information  
Surveillance data from monitoring programs, foodborne illness surveillance networks, laboratory testing results, environmental monitoring, and trend analysis of food safety indicators.  
Consumer complaints and feedback  
Economic and trade data

#### Component 2.4.4

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

Yes

Free text box, no character limit:

Establishing information sharing arrangements with international partners is essential for enhancing global cooperation, improving risk management practices, harmonising regulatory approaches, and safeguarding public health in the increasingly interconnected and interdependent world of food safety and regulation. By leveraging the collective expertise and resources of the international community, regulatory agencies can better address shared challenges and achieve common goals in protecting consumers and ensuring the safety and integrity of the food supply.

What should be the focus of such information sharing arrangements?

Free text box, no character limit:

#### Component 2.4.5

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

Yes

Free text box, no character limit:

Clarity and transparency  
Consistent interpretation  
Risk-based approach  
Facilitated compliance  
Enhanced communication and engagement  
Consistency in enforcement  
Continuous improvement

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

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

Yes

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?

Yes

Free text box, no character limit:

#### Component 2.4.7

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

Yes

Free text box, no character limit:

## Component 2.4

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

Prefer not to respond / I don't know

Free text box, no character limit:

## Section 6 - Net Benefit

### Section 6 - Net Benefit (Option 1)

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

Prefer not to respond / I don't know

Free text box, no character limit:

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?

No

Free text box, no character limit:

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

Prefer not to respond / I don't know

Free text box, no character limit:

### Section 6 - Net Benefit (Option 2)

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

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?

No

Free text box, no character limit:

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

Prefer not to respond / I don't know

Free text box, no character limit:

## Section 8 - Best option and implementation

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

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

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?

Prefer not to respond / I don't know

Free text box, no character limit:

## Section 8 - Best option and implementation (Delivery risks)

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

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?

Prefer not to respond / I don't know

Free text box, no character limit:

## Section 9 - Evaluation of the preferred option

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

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?

Yes

Free text box, no character limit:

ADOHTA represents dental and oral health therapists. These oral health professionals are qualified to diagnose and treat dental diseases across all age groups and work across both public and private sectors, as well as in academia, health policy, and teaching. Food standards have significant impacts on general and oral health, and although ADOHTA members are not directly impacted by the FSANZ Act there are aspects of the Act, such as nutritional standards and food labelling, which can have impacts on consumer oral health. It is well known sugars contribute to dental decay, FSANZ standards that promote healthier food choices can have a positive impact on oral health. FSANZ also regulates food labelling requirements - clear and accurate labelling can help consumers make informed choices about their food and beverage consumption which can influence oral health outcomes.

ADOHTA hopes this review results in a stronger Act, enabling Australian's access to food of a high standard, that is also leads to better general and oral health outcomes.

## Privacy and Confidentiality

Do you want this submission to be treated as 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: