

November 16, 2020

To: <foodregulationmodernisation@health.gov.au>

## GeneEthics comments on the Scoping Paper to Review the FSANZ Act

### INTRODUCTION

Engagement, Facilitation and genuine Participation - absent

The Review webpage notes that “In addition to the FSANZ Act Review, three other projects are being progressed under the ambitious reform agenda of the Food Regulation System. These projects are being progressed in parallel to develop a new, best practice regulatory, legislative and operational basis for the system. **There will be several opportunities for stakeholders to provide input** to this reform agenda throughout its development and implementation.”

The Review Team emailed GeneEthics a notice near the end of August, addressing us as “Stakeholder”. We registered to be a participant in the process and to be consulted, as such. On August 31, 2020 a return email said “Thank you Mr Phelps for your email and your interest in the food regulation modernisation work. We have added you to our email database and look forward to engaging with you further as this work progresses. Best regards Project Office | Food Regulation Standing Committee.” The next communication was a notice of the Public Consultation in early October.

Yet the Scoping Paper now discloses that key stakeholders – including industry and government – had been secretly consulted since July 2020. The discussions with privileged insiders influenced the framing, ideas for regulatory reform and content of recommendations in the Scoping Paper. This is not in conformity with the basic Engagement Principles of the Food Regulation System.<sup>1</sup>

This failure to consult widely and in a timely manner discredits the review and its intentions. Unless such failures of engagement and participation are remedied, we will not recommend to our 7,000 constituents that they participate any further in the process.

The Review should return to first principles so it is troubling that, as Table 4 of the Scoping Paper notes “Ministerial guidelines are not binding on FSANZ.” The Scoping Paper only refers to Principles in some examples such as infant formula, where it laments that “If additives in infant formula products and other foods is rejected because a health benefit cannot be demonstrated, the favourable trade and economic benefits determined to accrue would be foregone.” Although “Supporting trade is not currently an explicit core goal for FSANZ as set out in s 3 of the Act,” trade and marketing often appear to trump the higher order goals of “The protection of public health and safety; The provision of adequate information relating to food; and The prevention of misleading or deceptive conduct.”

These goals require amendment, to require more pro-action from the whole food regulatory system so, for example, it has “the promotion of public and community health, safety and general wellbeing” as its principal purpose.

## First Principles – toward success

The food system should be based on first principles because, if it is not, it will continue to fail to meet its clear responsibilities to serve the public interest, rather than the profits and purposes of big agribusiness and transnational fake food industries.

Australia and NZ commitments to United Nations charters and treaties would be a sound place to begin, as they have the imprimatur of most countries around the world. So, for example, The Right to Adequate Food is agreed as a goal, though the world, including Australia and its food production and delivery systems, fail abysmally to deliver adequate and affordable food.

For instance, “Research on food insecurity in Australia has typically relied on a single-item measure and finds that approximately 5% of the population experiences food insecurity.”<sup>2</sup> That means approximately 1,250,000 of our people, including many children, have their lives permanently blighted because of the food system’s abject failure. That is a national scandal and totally unacceptable, and this review should play a part in seeking some redress.

The UN asserts that “The right to food is an inclusive right. It is not simply a right to a minimum ration of calories, proteins and other specific nutrients. It is a right to all nutritional elements that a person needs to live a healthy and active life, and to the means to access them.”

“Adequacy means that the food must satisfy dietary needs, taking into account the individual’s age, living conditions, health, occupation, sex, etc. For example, if children’s food does not contain the nutrients necessary for their physical and mental development, it is not adequate. Food that is energy-dense and low-nutrient, which can contribute to obesity and other illnesses, could be another example of inadequate food. Food should be safe for human consumption and free from adverse substances, such as contaminants from industrial or agricultural processes, including residues from pesticides, hormones or veterinary drugs. Adequate food should also be culturally acceptable.”<sup>1</sup>

Hear, hear!! Our food regulatory systems fail to observe or implement such principles so they must be renovated from the ground up.

## REVIEW QUESTIONS

### Q 1a Is there still a compelling case for regulating food?

FSANZ and the Food Forum should constantly be aware that they are duty-bound to be the community’s watchdog and guide on the safety, health and wellbeing that the human food supply should deliver.

Yes, “there is a clear, ongoing need for regulation of food,” from seed and source, to spoon. For instance, industrial seed is now routinely coated with various synthetic chemicals, which are also sprayed on the growing crop. Still more are added in food processing. Yet the cumulative and synergistic impacts of these chemical cocktails are ignored. FSANZ should be charged with the task of setting the Maximum Residue Levels of synthetic chemicals in the food supply on the basis of safety assessments, instead of the APVMA setting them with agronomic use being the benchmark – under the undue influence of the agrichemical companies.

Our food regulator - Food Standards Australia New Zealand (FSANZ) and the Food Forum are failing the Australian and NZ public. The tame and unrealistic claim that “the food regulatory system can be improved, but it is not broken,” is manifestly baseless. FSANZ should be exercising precaution but is indifferent and reckless, blinkered by its bias in favour of the food industry, markets and trade. It unrelentingly puts the interests of corporations – especially global transnationals – ahead of community health, safety and wellbeing.

The Scoping Paper’s claim that “food producers and manufacturers have a vested interest in

assuring food is safe to eat,” is manifestly false but reflects their undue influence on food regulation. The seed, agrichemical, food processing, fast food, and retail industries are primarily motivated to maximise profits and minimize regulation. From chemical-treated seed through to ultra-processed food-like-substances, unacknowledged and unregulated hazards and risks abound.

The agribusiness and food industries have little stake in ameliorating the community-wide and long-term health impacts of unsafe and unhealthy foods, nor the cumulative and synergistic impacts of the potent mixture of synthetic chemical residues, food additives and processing aids, preservatives, and artificial colourings and flavourings – many masquerading as ‘natural’ when they are totally synthetic - in processed food. To add insult to injury, they are hidden on labels behind reference numbers and traffic light promotions.

FSANZ rubberstamps various novel food production processes and products that detract from public safety health and wellbeing, shirking its assigned responsibilities. The regulator’s strategy is to minimize labelling that would enable shoppers to give fully informed consent to spend their limited budgets wisely on what they and their families eat.

Novel foods and food ingredients, often with little or zero history of safe use in the human food supply, are approved on the basis of industry data that has mostly never been published or peer-reviewed. It is often guarded with unjustified and self-serving Commercial in Confidence claims.

The FSANZ claim that the regulators and assessors themselves provide independent peer review, when they apply questionable industry concepts such as ‘substantial equivalence’ to justify claims of safety, is sheer recklessness. Corporate interests are systematically prioritized ahead of the needs of the community that FSANZ is charged with protecting and sustaining.

FSANZ fails the public when, despite robust evidence of harm, it approves an array of Genetically Manipulated Organisms (GM) and their products, irradiated ‘fresh’ fruits and vegetables; and nano-materials with scant histories of safe use; food packaging with cancer-inducing chemicals that leach into their contents and artificially extend shelf-life; ingredients that may cause anaphylactic shock, allergies or hyperactivity; and a myriad of pesticide and other chemical residues in food.

## **1b What market failure(s) should governments seek to address through regulation of food?**

This question betrays the real intent of the present unresponsive and moribund food regulatory system with marketing and trade as its main measures of effectiveness and success.

FSANZ should have uppermost its responsibility for the lifetime safety, health and wellbeing of the community, now and long into the future. This should be ensured by a genuinely open, transparent and accountable food regulatory system that is user friendly and responsive to the interested and affected public.

The overwhelming evidence that some permitted foods and food ingredients harm individual and community health and wellbeing means they should be banned. Salt, fat and sugar are the most renowned examples and all should be regulated to minimise their use which is promoting pandemics of obesity, diabetes, hypertension, cancer and other maladies. Yet our food regulator and acolytes are torpid on these critical public health challenges.

## **2. Are there other significant focus areas that should be considered as part of the Review?**

This review should facilitate the much-needed thorough overhaul of the whole food regulatory system, including FSANZ, the Food Forum, the Food Regulation Standing Committee. The reforms must be founded in fundamental principles and not merely rearrange the window-dressing as it appears set to do.

If afforded the opportunity, as we expect to be, we will have more to say as this review process continues.

Yours sincerely,

A handwritten signature in black ink that reads "Bob Phelps". The signature is written in a cursive style and is underlined with a single horizontal line.

Bob Phelps  
Executive Director

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<sup>1</sup> Stakeholder Engagement Strategy for the Food Regulation System, Engagement Principles.

<https://www1.health.gov.au/internet/publications/publishing.nsf/Content/foodsecretariat-stakeholder-engagement-toc~3>

<sup>2</sup> Ami N. Seiwright, Zoe Callis, and Paul Flatau, Food Insecurity and Socioeconomic Disadvantage in Australia, *Int J Environ Res Public Health*. 2020 Jan; 17(2): 559, 2020 Jan 15. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7014009/>

<sup>2</sup> The Right to Adequate Food Fact Sheet No. 34. United Nations Human Rights and FAO. <https://www.ohchr.org/Documents/Publications/FactSheet34en.pdf>

November 20, 2020

To: <foodregulationmodernisation@health.gov.au>

## **GeneEthics supplementary comments on Scoping Paper to Review the FSANZ Act**

Dear Review Team:

GeneEthics has thoroughly reviewed and whole-heartedly supports the Friends of the Earth responses and recommendations to the Scoping Paper's Questions and Reform Ideas so we will not assess them further in detail here.

We are dismayed that the Scoping Paper was prepared and published without civil society participation so that many of the proposed measures seek to continue and to expand the industrial food system's 'business-as-usual' approach when a profound revolution of ideas is needed.

Suffice it to say that we strongly disagree with the following:

- Reform idea 2 - Recognise trade as a core goal and reframe consumer choice as a factor to which FSANZ 'must have regard'.  
FSANZ must have safety, health and wellbeing, not trade, among its core goals, as other instrumentalities are charged with responsibility for innovation, trade and marketing. Informing and empowering the public to make fully informed dietary decisions is FSANZ core business and must not be optional.
- Reform idea 3 – Establish criteria in the Act that the Forum must meet to request a review of a draft regulatory measure.  
Food Forum powers must not be qualified as its members are the community's representatives in a contested policy zone and it is the one place where the public can appeal for a collective review of FSANZ' worst decisions.
- Reform idea 10 – Provide for FSANZ to adopt or accept risk assessments from overseas jurisdictions.  
This is an invitation for FSANZ to enter a race to adopt the weakest assessments, often from countries like the USA where policy is made under the strongest influence of industry lobbyists and the review checks and balances are most compromised.
- Reform idea 11 – Enable FSANZ to adopt international standards.  
Public access, engagement and surveillance of Codex and other international food setting standards is minimal, while global corporations freely exercise their influence in these forums to optimise the safety, health and wellbeing parameters of the world's food supply, for their own profit-driven purposes.
- Reform idea 12 – Create industry-led pathways to expedite applications and bring new products to market.  
Industry self-regulation, especially that which would fast track products to market, would further render the regulatory system a creature of industry rather than the community.
- Reform idea 21 – Streamline Board appointments and nominations.  
Government Boards, Advisory Committees and other bodies charged with providing critical review and checks and balances on the public's behalf are commonly stacked with mates and people with undisclosed conflicts of interest. Streamlining without even nominal oversight of selection processes would compound these unacceptable practices.

- Reform idea 23 – Reduce Board size.  
This is another recipe for removing those who might act on safety, health and wellness, in the public interest. The greater diversity of views represented on any Board, we hopefully expect that the Board may be truer to its mission and more accountable to constituents.
- Reform idea 24 – Expand scope of applications for which FSANZ can recover costs.  
Cost recovery always tends to compromise the integrity and independence of regulators, so fund FSANZ entirely from a Treasury Budget allocation - like the OGTR - and make any applicant fees for service and cost recovery payable direct to Treasury.

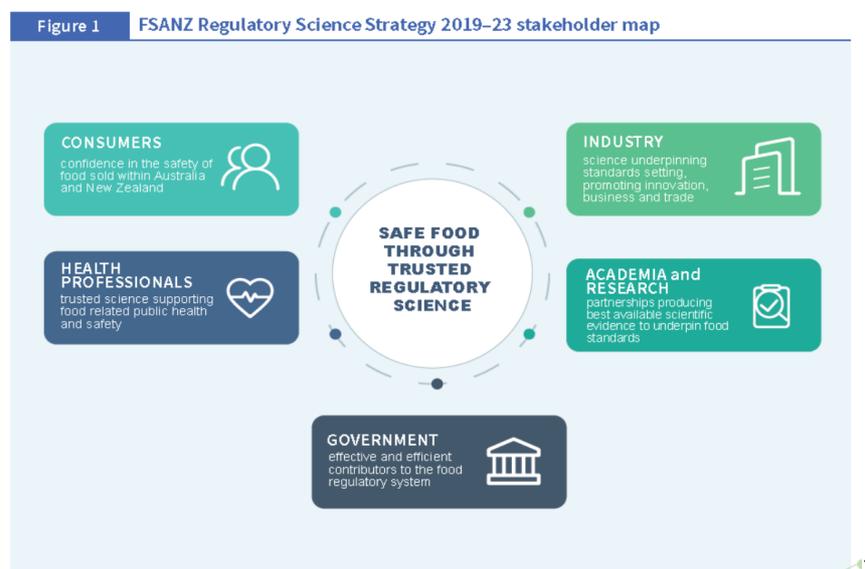
33. What are the top 2-3 most pressing issues to resolve through change to the Act and associated operations and responsibilities of FSANZ?

- Enshrining safety, health and well-being – broadly and robustly defined - as both the immediate and long-term public health goals of FSANZ, the Food Forum and the whole Food Regulatory system, while also divesting trade, markets, innovation and other non-core considerations and responsibilities to other regulatory bodies;
- Exercising complete openness, transparency, precaution and accountability throughout the food system, in all the processes of production as well as their products – especially in relation to novel processes (e.g. Gene Editing and Genetic Manipulation; nanomaterials; irradiation) and their products, which all have a scant history of safe use and limited scientific evidence of their short and long term impacts of safety, health and wellbeing;
- Programs to engage public participation, education and full knowledge of food production processes and products, including social (e.g. public health and welfare costs; epigenetic impacts of chemicals and toxins on future generations; salt, fat and sugar), technical (e.g. irradiation, synthetic biology and nanomaterials) ethical (e.g. animal mistreatment; forced labor and slavery) and environmental (packaging pollution, effluents, waste).

35 “What other reform ideas should be considered to address the issues identified in the paper, assuming no resource constraints?” Our further comments aim to contribute to answering this catchall question.

## FSANZ Vision

FSANZ’s present vision “that consumers have a high level of confidence in the safety of food” is an extremely narrow, PR-driven, and distorted objective which misrepresents its responsibilities. The term ‘consumer’, also used throughout the Scoping Paper, casts citizens in the role of passive, poorly informed and manipulable victims of consumerism. This implies that we can be led to buy food-like products that compromise our short and long term safety, health and wellbeing. Yet FSANZ does little more than window-dressing its technocratic operations with this schema which epitomises a problematic approach, based on flawed ‘regulatory science’.



Those who eat food are labelled 'Consumers' and are merely required to have passive "confidence in the safety of food". FSANZ ignores public anticipation that food also offers a good balanced and nutritional diet that delivers safety, health and wellbeing to themselves and their families.

In contrast, Industry is credited as "science underpinning standards setting, promoting innovation, business and trade". There is no hint of the global ultra-processed 'food' industry that has direct responsibility for the global pandemic of salt, fat and sugar-induced obesity and systemic illness.

FSANZ claims to serve the public interest but, in reality, its core clientele is the global Big Food and Farming fraternity with their unscrupulous commercial agendas and interests. This undermines FSANZ capacity to achieve its core safety, health and wellbeing objectives.

FSANZ spells out its compromised assessment processes and concessions to industry, when it concedes "The risk analysis framework that we use ... is refined **to ensure the minimum regulatory burdens necessary on the food industry and to achieve a more fit-for-purpose approach to risk analysis.** Regulatory science is a key component of this model."<sup>2</sup>

We seriously question whether a flawed 'regulatory science' regime that fills data gaps with best guesses and opinions can deliver on FSANZ promises of "A strong scientific evidence base (that) ... safeguards a sustainable food supply, prevents consumers from being misled, and facilitates domestic and international trade by reducing uncertainty and commercial risk."<sup>3</sup>

How were the public and independent experts represented, when FSANZ claims "In 2018–19, we undertook consultation with key stakeholders around the role of FSANZ in the regulatory system in Australia and New Zealand." (ibid)

We are eager to see health and wellbeing – broadly defined to include access to balanced and nutritious diets – as well as safety to justify FSANZ unwarranted claim that "Ultimately, our science and standards support all consumers every day through enabling all people to make confident food choices, experience food from across the world and enjoy the many other benefits from a safe food supply." (ibid)

**To enhance public confidence in FSANZ's impartiality, credibility and public standing, all of its food industry innovation, trade promotion and market development ought to be removed from its remit and legislation.**

These tasks compromise and diminish its food safety, health and wellbeing commitments, and its capacity to fulfil the legitimate public interest goals it was set up to serve. DFAT, AusTrade, and the Department of Industry, Science, Energy and Resources, etc, should be responsible for these commercial activities.

To genuinely deliver food safety, health and wellbeing for every Australian would certainly win the trust and confidence that FSANZ craves.

**So a revised FSANZ Vision Statement may be:**

**"A precautionary food regulation system, to protect and promote the safety, health and wellbeing of all Australians, with their full knowledge and participation."**

"The precautionary principle asserts that the burden of proof for potentially harmful actions by industry or government rests on the assurance of safety and that when there are threats of serious damage, scientific uncertainty must be resolved in favour of prevention. Yet we in public health are sometimes guilty of not adhering to this principle."<sup>4</sup> So is FSANZ. It should adopt and act on the Precautionary Principle in all its dealings.

The regulatory roles that FSANZ and the Food Forum play should be framed as integrated components of Australia's whole food system – from seed and sperm, to spoon. The entire food system – including its regulation - should be geared to meeting every Australian's:

- right to an affordable and balanced diet of safe, fresh and nutritionally beneficial foods;
- health and wellbeing, as the basis for fully achieving everyone's potential in life;
- essential knowledge and fully informed access to an abundant and healthy whole food diet.

FSANZ and the Food Forum have many allies working to improve the food system but many of its regulatory decisions and approvals are inimical to their life-affirming goals, because it is captive of industry.

For instance, the Federal Department of Health's Eat For Health program offers guidance on the ideal daily amounts of fresh fruits, vegetables, grains and other food groups for diverse age groups and genders to eat.<sup>5</sup> Australia's Healthy Eating Pyramid<sup>6</sup> is another example of excellent resources available on the web that FSANZ should conform with, to partner in the community-wide dissemination and adoption of the healthy and safe eating that it should promote.

But meanwhile, FSANZ repeatedly approves a myriad of food processing aids, additives and other ultra-processed and synthetic ingredients for use in manufactured food-like products that are inimical to food safety, and human health and wellbeing goals. As many of these are used in junk foods dispensed for immediate consumption through fast food outlets and restaurants, the public is trapped in the dark, as no honest labels or other information are required.

FSANZ also tends to rest on its science laurels, as though scientific evidence and understanding did not continue to evolve and accumulate. For example, in its recent Safety assessment of Application A1202, Food derived from herbicide-tolerant and insect-protected corn line DP23211, FSANZ cites its own 2013 rebuttal of Professor Jack Heinemann's<sup>7</sup> published and peer-reviewed paper<sup>8</sup>, as if it did not need to consider any further relevant research or reviews of the risks of the dsRNA that Corteva used for its gene manipulation.<sup>9</sup>

There is also a danger of group think, where FSANZ regulatory science relies on old analysis or accepts the uncritical views of regulators in other jurisdictions. FSANZ should listen impartially to all sides in food discussions and debates, instead of only improving its systems to more promptly and passively meet industry's commercial goals.

## **Public communication, engagement and participation**

**We propose that FSANZ establish interactive forums for public communication, engagement and participation where discussion and disclosure of its processes, procedures and priorities can occur, in a spirit of co-operation and collegiality.**

Food insecurity, malnutrition, and starvation, but also rampant obesity and food waste, are among the starkest hallmarks of Australia and the world's clear food system failures. The whole food system fails to deliver plentiful, fresh, nutritious and affordable food to all Australians, and FSANZ should acknowledge, accept and work with the community to remedy its share of responsibility.

As the AAAS observes "By 2050, 45 percent of the world's population could be overweight and 16 percent obese - compared to about 29 and 9 percent in 2010. This development is due to the insufficient global distribution of food as well as to the shift from scarcely processed plant-based diets towards unbalanced, affluent diets, where animal protein, sugar and fat displace whole grains and pulses."<sup>10</sup>

Yet FSANZ most influential clientele are among the biggest and most irresponsible corporations globally, falsely claiming to 'feed the world' when the exact opposite is true. So FSANZ becomes a lightning rod for criticism of its opaque and unresponsive style of operation and decision-making.

FSANZ should embrace its expert critics and the interested public as allies and colleagues, supporting much needed change to food systems and how they are regulated. FSANZ now seems to view the public – whom it should serve - as ill-informed and hostile adversaries, to be sidelined, discredited and denigrated for questioning the wisdom of FSANZ regulatory decisions.<sup>11 12</sup>

FSANZ systematically ignores, criticises or dismisses the submissions of those who spend the time and resources to comment on applications. Written submissions are invited during a limited window of opportunity, then the evidence, arguments and points of concern submitted are briefly critiqued and dismissed in a 'Summary of issues raised by submissions' near the end of each 'Approval report'. This is disempowering and disheartening.

For over 30 years GeneEthics has sought partnerships in its advocacy for improvements to the food supply and its regulation. For instance, when FSANZ has granted us very constrained opportunities to comment on specific applications, we have repeatedly commented on novel foods made using Genetic Manipulation and Gene Editing techniques, Irradiated herbs, spices and 'fresh' fruits and vegetables, and foods that contain Nanomaterials.

Before key information was more freely available online, we trekked to FSANZ to photocopy redacted documents on the premises at our own expense. Regulators met with us once though we requested other meetings.

Many other interested individuals and civil society groups have come and gone over these three decades, disillusioned, depleted and disgruntled, when regulators and policy-makers have been consistently unresponsive and antagonistic to their good intentions.

**FSANZ should provide more open and interactive processes, mechanisms and forums in which the experts and the general public can meaningfully communicate, engage and participate with the regulators, Ministers on the Food Forum, and members of the food Regulation Standing Committee.**

### **Recommendations for FSANZ and the Food Forum**

1. Make improving individual and community-wide safety, health and well-being the core objectives of the FSANZ and Food Forum Regulatory System;
2. Improve all opportunities and processes, for the timely and meaningful participation of independent experts, the interested and informed public, and civil society advocates, in FSANZ and Food Forum regulatory affairs;
3. Remove food industry innovation, trade promotion and market development from FSANZ goals as they undermine FSANZ safety, health and wellbeing core objectives and are DFAT, AusTrade, and Department of Industry, Science, Energy and Resources responsibilities;
4. Make the precautionary principle central to FSANZ legislation, regulation and practice, to maximize food-related safety, health and well-being, and as an antidote to the scant evidence and flawed industry data that is frequently presented with applications;
5. Move the onus of proof and advocacy for the safety, health and wellbeing of the food supply off the regulators (who should be impartial), onto the applicants, patent owners, and producers;
6. Consolidate Ministerial and Departmental responsibility for FSANZ and the Forum exclusively with the Health Departments in all jurisdictions, where protecting public safety, health and wellbeing are most robustly secured;
7. Adopt genuine, tried-and-true, scientific processes and principles in all FSANZ systems, to replace regulatory science that uses unsubstantiated opinions and guesses to fill the many gaps in scientific data, evidence and understanding that applicants present;
8. Enable well-designed experiments to be required or commissioned to fill such data gaps;
9. Fund long term epidemiological studies of agrochemical residues in the human and animal food supplies, biomonitor the human population, and explore short and longer term impacts;
10. Require peer-reviewed publications to validate all company-generated data, to ensure that the results are replicable and verifiable;
11. Develop standards, benchmarks and minimum requirements to replace all guidelines, industry

- self-regulation and assessment;
12. Require registrants to annually report any adverse findings on the performance and impact of their approved products, and any relevant new scientific evidence;
  13. Improve the monitoring of agrochemical and other hazardous residues in foods, from farming, processing and packaging;
  14. Encourage and promote food safety, health and wellbeing through eating well, particularly the recommended daily serves of fresh fruits and vegetables - for everyone and future generations;
  15. Fund FSANZ with a Federal Budget appropriation sufficient to operate - like the OGTR – so its impartiality is not further compromised through cost recovery from food and related industries.

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<sup>1</sup> Regulatory science at FSANZ.

<https://www.foodstandards.gov.au/publications/RegulatoryScienceStrategy201923/Pages/Regulatory-science-at-FSANZ.aspx>

<sup>2</sup> Ibid.

<sup>3</sup> Importance of high quality science to the food regulatory system.

<https://www.foodstandards.gov.au/publications/RegulatoryScienceStrategy201923/Pages/Importance-of-high-quality-science-to-the-food-regulatory-system.aspx>

<sup>4</sup> Goldstein, B.D, The Precautionary Principle Also Applies to Public Health Actions. *Am J Public Health*. 2001 September; 91(9): 1358–1361. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1446778/>

<sup>5</sup> <https://www.eatforhealth.gov.au/food-essentials/how-much-do-we-need-each-day/recommended-number-serves-adults-nutrition>

<sup>6</sup> <https://nutritionaustralia.org/fact-sheets/healthy-eating-pyramid/>

<sup>7</sup> FSANZ (2013) Response to Heinemann *et al* on the regulation of GM crops and foods developed using gene silencing. Food Standards Australia New Zealand, Canberra.

<http://www.foodstandards.gov.au/consumer/gmfood/Pages/Response-to-Heinemann-et-al-on-the-regulation-of-GM-crops-and-foods-developed-using-gene-silencing.aspx>

<sup>8</sup> <https://pdf.sciencedirectassets.com/271763/1-s2.0-S0160412013X00042/1-s2.0-S0160412013000494/main.pdf>

<sup>9</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7186845/>

<sup>10</sup> Starved, stuffed and squandered: Consequences of decades of global nutrition transition, Potsdam Institute for Climate Impact Research (PIK). [https://www.eurekalert.org/pub\\_releases/2020-11/pifc-ssa111620.php](https://www.eurekalert.org/pub_releases/2020-11/pifc-ssa111620.php)

<sup>11</sup> [https://www.foodstandards.gov.au/consumer/gmfood/adverse/Documents/11\\_Table%20of%20studies\\_updated\\_26Nov15.pdf](https://www.foodstandards.gov.au/consumer/gmfood/adverse/Documents/11_Table%20of%20studies_updated_26Nov15.pdf)

<sup>12</sup> <https://www.foodstandards.gov.au/consumer/gmfood/Pages/Detailed-commentary-.aspx>