

Submission

A1341 – Cell-cultured duck (*Anas platyrhynchos domesticus*) biomass

FSANZ Call for Submissions – Suprême SAS
(Gourmey) | July 2026



Cellular
Agriculture
Australia

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1. Introduction

Cellular Agriculture Australia welcomes the opportunity to provide this submission to Food Standards Australia New Zealand (FSANZ) Call for Submissions (CFS) on the assessment of **A1341 – Cell-cultured duck (*Anas platyrhynchos domesticus*) biomass** submitted by Suprême SAS (Gourmey).

Cellular Agriculture Australia led the preparation of this submission with input from members of its [Industry Working Group \(Regulation\)](#), feedback from Australian and international cultivated meat companies, and sought specific advice from James Ryall, PhD, Life Sciences and Biotech Consultant, and former Chief Scientific Officer at Vow (2019–2023).

[Cellular Agriculture Australia](#) (CAA) is a non-profit charity advocating for emerging food production technologies and ingredient innovation – including cultivated, fermented and plant protein applications – and their integration across the food system. It is building the policy, regulatory, and investment settings required to unlock a new generation of food and ingredient production in Australia.

2. Response to the consultation questions

2.1 Please provide your overall view on FSANZ's assessment for application A1341 and the draft regulatory measure.

CAA welcomes the outcome of FSANZ's assessment of cultivated duck identifying no public health or safety concerns associated with either the production cell line or the resulting biomass. It fully supports the amendments to Schedules 3 and 25A of the Code to permit the use of cultivated duck biomass as a wholesale food and as an ingredient in retail & foodservice (consumer) food preparations.

Further, CAA supports FSANZ's proposal that cultivated duck would be subject to the same labelling conditions that apply to cultivated quail. However, CAA remains of the position that the use of the 'cell-' as a qualifying term is less effective in facilitating consumer acceptance and trust in products. It accepts that this is not FSANZ's primary concern, but submits [as CAA, Food Frontier and the Alternative Protein Council submitted to the 2nd CFS on Application 1269 ([A1269](#))], that it should be a consideration.

Please explain your response

Safety

CAA has carefully reviewed the publicly available safety data provided by the Applicant and is aligned with FSANZ's risk assessment:

- The cells remain genetically and phenotypically stable during production
- There are no enduring concerns from the estimated exposures to food processing substances used during production;
- There are no microbiological concerns relating to the cell line or production process; and
- There are no nutritional concerns associated with the consumption of cultivated duck biomass.

Labelling

As CAA, Food Frontier and the Alternative Protein Association submitted to the 2nd CFS for Application 1269 ([A1269](#)), FSANZ's rationale for its preference for 'cell-' in the cultivated food names is that it allows consumers to identify the true nature of the food more clearly. As noted in the above-mentioned submission, FSANZ's labelling approach for cultivated food was informed by consumer research undertaken by the University of Adelaide, along with the assessment of feedback from the first round of consultation (on the same application).

As indicated by CAA and its co-signatories at the time, the data has several limitations including limited quality of studies, the absence of ANZ data on terminology preferences, and the use of outdated data (from 2018-19).

CAA again calls upon FSANZ to increase its engagement with the cellular agriculture sector to complement its understanding of the best available evidence base with the commercial and technical advances being made by industry participants. It is also apparent that there is a need for additional and more contemporary research with an Australia-New Zealand focus.

2.2 If there is any other information you would like to provide for the application A1341 consultation, please include this in the box below.

2.2.1 Proposed definition of ‘cell-cultured food’

CAA acknowledges the Code’s definition of ‘cell-cultured food’:

“Cell-cultured food means a food obtained by culturing cells isolated from any of the following sources: livestock; poultry; game; seafood (including fish); an egg or an embryo of any of the former.”

As of mid-2026, this definition does not reflect the current scope of cell-cultivated products in development. For example, it does not reflect the emergence of cultivated coffee or cocoa.

CAA suggests this Application, although for animal-derived cells, is an opportunity to revisit and future-proof the definition. It proposes the following definition, for consideration by FSANZ:

“Cell-cultured food means a food (whole food or ingredient) that is developed by isolating and cultivating cells from animals or plants, which on their own or in combination with other ingredients, produce new or analogous consumer food products.”

Alternatively, if FSANZ retains a standard for meat products only, then CAA suggests the definition be changed to ‘cell-cultured meat’ to provide clarity.

2.2.2 Recommendations for efficiency, consistency and predictability of future assessments

The Australian cellular agriculture sector is developing technologies that have the potential to contribute to food security, sovereign manufacturing capability, agricultural diversification and advanced food innovation. Additional applications are expected over the coming years. CAA offers the following recommendations for improvement:

Recognition of Platform-Based Evidence

The A1341 assessment demonstrates that many aspects of a cultivated food application relate to the manufacturing platform rather than the individual food product itself.

Examples include:

- Establishment and qualification of Master and Working Cell Banks;
- Good Cell Culture Practice (GCCP);
- Microbiological monitoring programs;
- Environmental monitoring;
- Analytical methods;
- Media component safety assessments;
- Process validation; and
- Quality management systems.

These elements are fundamental components of a manufacturing platform and are often independent of the specific species or final food product being assessed. FSANZ is encouraged to recognise that, where manufacturing platforms remain materially unchanged, previously assessed platform-level evidence should be referenced in future applications, allowing applicants to focus new submissions on product-specific safety considerations.

Such an approach would reduce unnecessary duplication of regulatory effort while maintaining equivalent standards of safety assessment.

Streamlined Assessment of Additional Cell Lines

CAA notes the regulatory framework establishes permissions for assessed cell lines.

As the sector develops, manufacturers may establish multiple production cell lines derived from the same species using equivalent manufacturing processes.

Where applicants can demonstrate that:

- The donor species is unchanged;
- Manufacturing processes remain materially equivalent;
- Cell bank qualification procedures are unchanged;
- Safety controls remain equivalent; and
- Product composition falls within previously assessed ranges.

CAA encourages FSANZ to consider an appropriately streamlined assessment pathway for additional production cell lines. This would recognise that many safety considerations have already been evaluated while preserving the requirement for applicants to demonstrate the safety and suitability of each new production cell line. Such an approach is consistent with risk-appropriate best practice regulation and would support continued innovation without reducing regulatory oversight.

2.2.3 Industry guidance

As a key stakeholder representing this emerging food industry sector, CAA welcomed the opportunity to review and provide comments on the proposed *FSANZ Cell-Cultured Food User Guide* (the '*User Guide*') early in 2026. It commends FSANZ for the further guidance provided through the example of the A1341 assessment.

CAA asks FSANZ to publish this guidance as soon as possible and calls upon FSANZ to keep the guidance updated as new innovations are developed and experiences are expanded. With a view to a dynamic guidance document, CAA offers the following comments for consideration of inclusion in future editions of the *User Guide*:

Development of a Framework for Reusable Scientific Evidence

It is recommended that FSANZ includes guidance identifying which categories of information may be considered reusable between applications and which categories should remain product-specific. For example, *platform-level evidence* may include the following:

- Manufacturing quality systems;
- Validation of analytical methods;
- Supplier qualification systems;
- Microbiological testing methodologies;
- Environmental monitoring programs;
- Toxicological assessment of common media components; and
- Manufacturing process controls.

Product-specific evidence might continue to include:

- Cell line identity;
- Species verification;
- Genetic and phenotypic stability;
- Compositional analysis;
- Nutritional assessment;
- Dietary exposure assessment;
- Product specifications; and
- Any novel process or ingredient unique to the application.

Providing greater clarity regarding evidence reuse would improve regulatory efficiency for both applicants and FSANZ while ensuring that scientific scrutiny remains focused on the elements that differ between products.

Supporting Innovation Through Regulatory Predictability

Predictable regulatory pathways are essential for encouraging investment in emerging food technologies. In particular, industry would benefit from additional guidance describing:

- expectations for cell line characterisation;
- acceptable approaches to demonstrating genetic and phenotypic stability;
- expectations for compositional comparisons;
- approaches to microbiological risk management;
- circumstances where previously assessed evidence may be referenced in future submissions.

Non-meat Cultivated Food

Further, CAA asks FSANZ to provide advice on the pathway for non-meat cultivated foods.

3. Contact

CAA warmly welcomes the opportunity to engage further on any of the comments made within this submission; please contact:

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