

Food Frontier submission to FSANZ - A1269 from  
Vow Group Pty Ltd

First call for submissions (CFS)

# A1269 Cultured quail as a novel food



Food Standards Australia New Zealand (FSANZ) via FSANZ Consultation Hub  
(<https://consultations.foodstandards.gov.au>)

## **RE: A1269 Cultured quail as a novel food – Food Frontier Submission to FSANZ**

Food Frontier welcomes the opportunity to contribute to this call for submissions (CFS), seeking views on FSANZ’s hazard and risk assessment and proposed regulatory requirements to inform its decision on developing a measure to amend the Australia New Zealand Food Standards Code (the Code) to allow the use of Vow Group Pty Ltd (Vow) cultured quail as a novel food.

[Food Frontier](#) is the independent think tank on alternative proteins in Australia and New Zealand. Funded by grants and donations, our work is growing our region’s protein supply with new, sustainable and nutritious options that create value for businesses, farmers and consumers. Since 2017, Food Frontier’s research, events and direct engagement have been building a collective understanding of the economic, environmental, and public health benefits of alternative proteins, including ones produced via cellular agriculture technologies, in Australia and New Zealand.

Food Frontier supports research indicating that as the world’s population edges towards 9.7 billion people by 2050, current food production systems will be inadequate to produce enough protein to meet the expected growth in demand for protein, necessitating new and novel food production systems to produce safe and nutritious food and ingredients to augment the food supply. Investment, innovation, research and development, and good regulation to discover and safely commercialise new food production systems are required to bring new technologies, including cultivated meat and precision fermentation, to the market. The approval of novel food products like A1269, Cultured Quail as a food ingredient, for use in Australia and New Zealand, will ultimately lead to investment and innovation in the new field of cellular agriculture for food system innovation for Australian and New Zealand organisations.

For the purposes of this submission, Food Frontier will refer to the wider category of cultivated meat, also called cultured meat, where both terms are used to describe animal meat, including seafood, cultivated directly from cells, in a factory or bioreactor. Vow’s cultured quail product fits comfortably within this wider category. Category and product nomenclature is discussed later in this CFS paper.

Food Frontier congratulates Vow on its application, A1269, seeking approval to use cultured quail as a food ingredient, via an amendment to the current Food Standards Code. Vow’s cultured quail, made with embryonic fibroblasts from *Coturnix japonica*, or Japanese quail, will be used as a food ingredient in food products to be marketed and sold in Australia and New Zealand. Although cultivated meat products have been approved for sale in Singapore, the USA, and Israel, and are under evaluation in other jurisdictions, this is the first food ingredient product made using cultivated meat cells to be assessed for use in Australia. It is an important milestone for Vow and the cellular agriculture industry, and for FSANZ, as the first application of its kind to be evaluated by the agency responsible for setting the standards for safe food in Australia and New Zealand.

FSANZ is an independent statutory agency established by the Food Standards Australia New Zealand Act 1991 (FSANZ Act). FSANZ is part of the Australian Government's Health portfolio.

FSANZ is responsible for developing world-leading food standards for Australia and New Zealand that enable a wide variety of safe foods to be available to consumers. FSANZ's highly skilled subject matter experts, in collaboration with stakeholders, make informed decisions on food safety, public health and science that ensure consumers can trust the foods they choose to eat.

The standards in the Australia New Zealand Food Standards Code (the Code) are legislative instruments under the Legislation Act 2003. The authoritative versions of these standards can be found on the Australian Government Federal Register of Legislation, and changes are announced in the Food Standards Gazette notices.

FSANZ develops evidence-based standards for regulators and industry and administers the Code. The Code regulates the use of food ingredients, processing aids, colourings, additives, vitamins and minerals. It covers the composition of foods such as dairy, meat and beverages, as well as regulating food technologies like genetic modification. The Code also sets requirements for labelling for both packaged and unpackaged food, including mandatory warnings or advisory labels for things like allergens.

There are currently no regulations covering cell-cultured, also called cultivated or cultured meat, foods in Australia or New Zealand. The existing Code does not allow the sale of cultured quail as a food ingredient, or any cultivated meat product in Australia or New Zealand. To evaluate Vow's application to amend the Code to allow the use and sale of its cultured quail product, FSANZ has assessed the application under its Novel food permission standard (1.1.2-8<sup>1</sup>) within the Code, dealing with it as a Major Procedure. As part its comprehensive pre-market hazard and risk assessment, two rounds of public consultation will be conducted. This first call for submissions seeks views on FSANZ's hazard and risk assessment and proposed regulatory requirements to inform its decision on developing a measure to amend the Code.

Assessing the safety of these and future novel protein food products underpins the development of new food products safely delivering consumer choice. Finding the product safe and amending the Code to allow the sale of cultured quail as a food ingredient will provide confidence to consumers that these products are safe to eat. Approval will also build confidence in the investor community looking to invest in other cell-cultivated technologies that might also be approved to be safe to commercialise.

Food Frontier is not an expert scientific agency, although it does have significant capability in food safety. Its key strengths lie in producing research and reports to bring understanding about the need and opportunity for alternative proteins produced through food system innovation, to deliver new formats of protein to meet future demand and augment existing protein sources. This research highlights how these new products can deliver new industries and environmental

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<sup>1</sup> Australian Government, Federal Register of Legislation. 2023. Australia New Zealand Food Standards Code - Standard 1.1.2 – Definitions used throughout the Code. [cited Feb 2024] Available from: <https://www.legislation.gov.au/F2015L00385/latest/text>

and health benefits, and to synthesize industry challenges, opportunities and sentiment into forward-thinking policy asks and actions that build value for agricultural and food systems.

Food Frontier examined the following documents prepared by FSANZ and Vow.

1. [A1269 first call for Submissions<sup>2</sup>](#)
2. [Supporting document 1 - Hazard and Risk Assessment<sup>3</sup>](#)
3. [Supporting document 2 - Consumer Literature Review<sup>4</sup>](#)
4. [Supporting document 3 - Consumer Insights Tracker<sup>5</sup>](#)
5. [Supporting document 4 - Labelling<sup>6</sup>](#)
6. [Application A1269 from Vow Foods Pty Ltd<sup>7</sup>](#)

**Food Frontier accepts that FSANZ has the technical expertise required to assess this application and congratulates it on a thorough expert review.**

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<sup>2</sup> Food Standards Australia New Zealand (FSANZ), A1269 – Cultured Quail as a Novel Food. Call for Submissions – A1269 first call for submissions. 2023. [internet] [cited Feb 2024]. Available from: <https://www.foodstandards.gov.au/food-standards-code/applications/A1269-Cultured-Quail-as-a-Novel-Food>

<sup>3</sup> Food Standards Australia New Zealand (FSANZ), A1269 – Cultured Quail as a Novel Food. Call for Submissions - Supporting document 1 – Hazard and Risk Assessment. 2023. [internet] [cited Feb 2024]. Available from: <https://www.foodstandards.gov.au/food-standards-code/applications/A1269-Cultured-Quail-as-a-Novel-Food>

<sup>4</sup> Food Standards Australia New Zealand (FSANZ), A1269 – Cultured Quail as a Novel Food. Call for Submissions - Supporting document 2 – Consumer Literature Review. 2023. [internet] [cited Feb 2024]. Available from: <https://www.foodstandards.gov.au/food-standards-code/applications/A1269-Cultured-Quail-as-a-Novel-Food>

<sup>5</sup> Food Standards Australia New Zealand (FSANZ), A1269 – Cultured Quail as a Novel Food. Call for Submissions - Supporting document 3 – Consumer Insights Tracker. 2023. [internet] [cited Feb 2024]. Available from: <https://www.foodstandards.gov.au/food-standards-code/applications/A1269-Cultured-Quail-as-a-Novel-Food>

<sup>6</sup> Food Standards Australia New Zealand (FSANZ), A1269 – Cultured Quail as a Novel Food. Call for Submissions - Supporting document 4 – Labelling. 2023. [internet] [cited Feb 2024]. Available from: <https://www.foodstandards.gov.au/food-standards-code/applications/A1269-Cultured-Quail-as-a-Novel-Food>

<sup>7</sup> Food Standards Australia New Zealand (FSANZ), A1269 – Cultured Quail as a Novel Food. Call for Submissions – Application A1269 from Vow Foods Pty Ltd. 2023. [internet] [cited Feb 2024]. Available from: <https://www.foodstandards.gov.au/food-standards-code/applications/A1269-Cultured-Quail-as-a-Novel-Food>

## Hazard and risk assessment

The risk assessment for cultured quail cells evaluated: (1) hazards associated with the embryonic fibroblast cell line from Japanese quail; (2) the production process including any relevant inputs used to grow and propagate the Japanese quail cells; and (3) the cells at the point of harvest which includes collection, packaging and freezing.

Supporting document 1<sup>8</sup> sets out FSANZ's hazard and risk assessment which addressed microbiology, biotechnology, toxicology, allergenicity, nutrition and dietary intake/exposure considerations of Vow's application, and drew extensively from the methods set out in the FAO/WHO publication '[Food Safety Aspects of Cell-Based Food](#)'<sup>9</sup>.

FSANZ's assessment concluded that the cell line is genetically stable, and any microbiological risks associated with cell line sourcing are very low. Given the aseptic nature of cell proliferation/biomass production stages, the microbiological risk associated with cells at the point of harvest was very low. There were no toxicological concerns associated with the cell media or inputs used in the production process at the estimated consumption levels. No nutritional safety concerns were identified from the consumption of the harvested cells containing the levels of nutrients provided in the application. The available information indicated the harvested cells are unlikely to pose a food allergenicity concern for the general population.

Although two potential food safety hazards, microbial and other (foodborne pathogens) were identified in the assessment, they were not considered unique to Vow's cultured quail application and could be managed through standard food safety programs pursuant to Standard 3.2.1 (Food Safety Programs)<sup>10</sup>, and supported by existing good practices including Good Cell Culture Practice (GCCP), Good Hygienic Practices (GHP), and Good Manufacturing Practices (GMP).

**Food Frontier endorses FSANZ's expertise in making these findings and supports its assessment.**

<sup>8</sup> Food Standards Australia New Zealand (FSANZ), A1269 – Cultured Quail as a Novel Food. Call for Submissions - Supporting document 1 – Hazard and Risk Assessment. 2023. [internet] [cited Feb 2024]. Available from: <https://www.foodstandards.gov.au/food-standards-code/applications/A1269-Cultured-Quail-as-a-Novel-Food>

<sup>9</sup> FAO & WHO. 2023. Food safety aspects of cell-based food. Rome. [cited Feb 2024] Available from: <https://doi.org/10.4060/cc4855en>

<sup>10</sup> Australian Government, Federal Register of Legislation. 2023. Australia New Zealand Food Standards Code - Standard 3.2.1 - Food Safety Programs (Australia Only). [internet] [cited Feb 2024] Available from: <https://www.legislation.gov.au/F2008B00578/latest/text>

# Variation to the Australia New Zealand Food Standards Code (the Code) to allow the sale of cultured quail cells as a novel food

Vow's Cultured quail does not comply with the current definition of 'meat' or any other food product in Section 1.1.2-3<sup>11</sup> of the Code, and FSANZ proposes to amend this section of the Code to define a new food category for 'cell-cultured foods'.

FSANZ has not proposed precise wording of a new definition at this stage but indicated it should cover not only this food, but other subsequent foods of a similar nature, which may be certain types of cells, or a combination of cell types, with or without other components such as fats or scaffold.

Food Frontier supports this approach and in addition endorses Cellular Agriculture Australia's (CAA) proposed definition for Cell-cultivated food, noting Food Frontier's preference for the term to be defined as cell-cultivated not cell-cultured:

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

## Prescribed uses of cultured quail as a novel food

Approved novel foods are listed in Schedule 25 – Permitted novel foods<sup>12</sup> of the Code. FSANZ proposes that cultured quail be added to Schedule 25, with the following prescribed conditions (S25-2):

- that the food be mixed with other ingredients to form products such as, but not limited to, logs, rolls, and patties
- a specified name to identify Vow's cultured quail cells, e.g., "Cultured quail (*Coturnix japonica*) fibroblasts" (or similar)
- food must be produced under a food safety program (e.g., HACCP) in accordance with Standard 3.2.1 of the Code.

**Food Frontier supports FSANZ proposal for the listing and conditions of Vow's cultured quail on Schedule 25.**

<sup>11</sup> Australian Government, Federal Register of Legislation. 2023. Australia New Zealand Food Standards Code - Standard 1.1.2 – Definitions used throughout the Code. [internet] [cited Feb 2024] Available from: <https://www.legislation.gov.au/F2015L00385/latest/text>

<sup>12</sup> Australian Government, Federal Register of Legislation. 2023. Australia New Zealand Food Standards Code – Schedule 25 – Permitted novel foods. [internet] [cited Feb 2024] Available from: <https://www.legislation.gov.au/F2015L00440/latest/text>

## Consumer understanding

FSANZ undertook a rapid systematic evidence review to inform its consideration of the application A1269 – Cultured Quail as a novel food (Supporting document 2<sup>13</sup>). Consumer understanding, preference and perceptions of different terminologies for cell-cultured meats, as well as relative perceptions versus conventional meat were considered.

FSANZ has also commissioned the University of Adelaide to conduct a more comprehensive systemic literature review (call for submissions, 2.1.6 Consumer evidence<sup>14</sup>) that will examine consumers’ levels of awareness, understanding, perceived risks and benefits, and prospective behaviour regarding alternative proteins, including cell-cultured meats, to be used to inform the 2<sup>nd</sup> CFS.

Although current research indicates that consumers do not have a high level of understanding about cell-cultivated foods, this is not unexpected due to the nascency of the industry and food product availability. Consumer understanding will develop over time as foods made using these products become available and they become more familiar with foods made via cell cultivation.

Consumers can adapt rapidly to new product offerings when clear qualifier, descriptor, format and utility terms are used. Using the example of plant-based meat products, products made from plant protein designed to mimic the sensory experience of eating conventional meat began appearing on supermarket shelves in increasing numbers in 2017, but the evidence suggests that consumers clearly understand that these products are not conventional meat products and are made from plants.<sup>15 16</sup>

FAO and WHO’s 2023 publication Food Safety Aspects of Cell-based Foods<sup>17</sup> lists a wide range of modifier terms used by authorities, industry and developers, academia and the media which tends to show terms like ‘cell-based’, ‘cell-cultured’, ‘cultivated’ and ‘cultured’ are used in all sectors. A range of terms are currently permitted/allowed by regulatory authorities around the world. FSANZ research<sup>18</sup> indicates that incorporating the word ‘cell’ (‘cell-cultured’, ‘cell-cultivated’, ‘cell-based’ and others) best enables consumers to correctly identify the source and nature of the product. FSANZ research also found that the terms ‘cultured’ and ‘cultivated’ did

<sup>13</sup> Food Standards Australia New Zealand (FSANZ), A1269 – Cultured Quail as a Novel Food. Call for Submissions - Supporting document 2 – Consumer Literature Review. 2023. [internet] [cited Feb 2024]. Available from: <https://www.foodstandards.gov.au/food-standards-code/applications/A1269-Cultured-Quail-as-a-Novel-Food>

<sup>14</sup> Food Standards Australia New Zealand (FSANZ), A1269 – Cultured Quail as a Novel Food. Call for Submissions – A1269 first call for submissions. 2023. [internet] [cited Feb 2024]. Available from: <https://www.foodstandards.gov.au/food-standards-code/applications/A1269-Cultured-Quail-as-a-Novel-Food>

<sup>15</sup> Khara T, White S. Consumer perceptions of food labels. Institute for Sustainable Futures University of Technology Sydney. [Internet] Jan 2022 [cited 3 Feb 2024] Available from: <https://www.uts.edu.au/isf/explore-research/projects/australian-consumer-perceptions-plant-based-meats-and-food-labels>

<sup>16</sup> Gleckel J. Are Consumers Really Confused by Plant-Based Food Labels? An Empirical Study. Journal of Animal and Environmental Law. [Internet] 17 Nov 2020 [cited 3 Feb 2024] Available from: [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3727710](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3727710)

<sup>17</sup> FAO & WHO. 2023. Food safety aspects of cell-based food. Rome. [cited 3 Feb 2024] Available from: <https://doi.org/10.4060/cc4855en>

<sup>18</sup> Food Standards Australia New Zealand (FSANZ), A1269 – Cultured Quail as a Novel Food. Supporting document 2 – Consumer literature review – Application A1269. 2023. [internet] [cited Feb 2024]. Available from: <https://www.foodstandards.gov.au/food-standards-code/applications/A1269-Cultured-Quail-as-a-Novel-Food>

enable consumers to differentiate cell-cultured products from conventional meat to a moderate extent, albeit it was felt at a lower level of understanding.

GFI<sup>19</sup> research indicates an industry preference for the term ‘cultivated’, followed by a secondary preference for ‘cultured’. Food Frontier is a signatory to the Good Food Institute Asia Pacific (GFI-APAC) and Asia Pacific Society for Cellular Agriculture (APAC-SCA) memorandum of understanding for cultivated meat<sup>20</sup> along with 35 other organisations supporting or producing cellular agriculture products, designed to bring consistency of nomenclature to the wider industry.

**It is therefore Food Frontier’s preference that the term cell-cultivated or cultivated be used to describe these foods.**

Food Frontier conducted cultivated meat consumer understanding research in 2022.<sup>21</sup> Consumers from 5 markets (China, Japan, Singapore, South Korea, and Thailand), representative of the general population, were shown an image and description in their local language of a cell being taken from an animal and then cultivated in a cultivator to grow the cells to form a food product before being asked several questions about their knowledge and perceptions.

Table 1. Names for meat grown from animal cells most preferred by consumers (percent).

Name	China N=907	Japan N=518	Singapore N=797	South Korea N=721	Thailand N=883	Average across Asia N=3826
Clean meat	32%	23%	24%	25%	30%	27%
<b>Cultivated meat</b>	28%	12%	25%	18%	22%	22%
Cell-cultured meat	26%	6%	18%	14%	25%	19%
None of these	4%	47%	18%	23%	8%	17%
Cell-raised meat	26%	6%	10%	9%	18%	15%
<b>Cultured meat</b>	21%	10%	24%	21%	0%	15%
Cell-based meat	18%	2%	20%	9%	19%	15%
Lab-grown meat/Test tube meat	12%	3%	17%	5%	31%	15%
Man-made meat	23%	9%	9%	13%	14%	14%
Cellular meat	17%	3%	9%	8%	21%	13%
Synthetic meat	15%	11%	8%	7%	18%	12%
Propagated meat	13%	3%	7%	7%	16%	10%

*Green shading indicates more preferred, pink and orange shading indicates less preferred*

<sup>19</sup> Good Food Institute. 2023. Aligning cultivated food nomenclature across APAC. [internet] [cited Feb 2024]. Available from: <https://gfi-apac.org/industry/aligning-cultivated-food-nomenclature-across-apac>

<sup>20</sup> Good Food Institute APAC. MOU Cultivated Final. [internet] Oct 2022. [cited 3 Feb 2024] Available from: <https://drive.google.com/file/d/1qDTWk7GRAt4vAEQE8Zq63vwBYLTdSPpg/view>

<sup>21</sup> Heizen A - Mintel Consulting for Food Frontier. Building Successful export strategies taking alternative proteins to Asia. [Internal report] Oct 2022 [cited 5 Feb 2024] Available on request from Food Frontier.



When asked which of a variety of product names (listed in the Table 1) *'what would most prompt you to buy a meat product grown directly from animal cells'*, the results revealed a range of views, with "clean meat" the most preferred overall. Importantly, in Singapore where cultivated meat is

available for purchase and which recorded the highest consumer awareness responses, cultivated was the preferred term, followed closely by cell-cultured meat.

**Food Frontier supports FSANZ measuring and monitoring consumer understanding of cell-cultivated meat, including the more comprehensive systematic literature review underway, that will inform the second CFS.**

**We also urge FSANZ to consider wider industry research and experiences showing that consumers will quickly adapt to labelling that uses a range of qualifiers, and format and utility terms to accurately describe new food products.**

## Labelling

Part 1.2 of the Code, Labelling and other information requirements<sup>22</sup> set out the current generic labelling requirements for approved foods.

FSANZ considered how the requirements apply to cultured quail as a novel food ingredient, and whether additional labelling measures would be warranted. In developing the proposed approach, FSANZ also indicated that a number of other considerations were assessed including labelling risk management frameworks, ministerial policy guidelines, international and overseas regulations, literature review, industry perspectives and consumer evidence.

Food Frontier supports FSANZ's proposed labelling requirements would require the sector to label its products per a proposed standard definition, 'cell-cultivated food.' The term 'meat' would still be permitted for use in labelling as long as it is used in conjunction with the qualifier 'cell-cultivated.'

**Food Frontier supports the proposed labelling requirements, and the use of a qualifier, but urges that it is too premature to mandate the labelling nomenclature and qualifier.**

Looking abroad at the two jurisdictions that had approved cultivated meat products for sale, FSANZ noted that there was no consistency in the regulatory labelling approaches adopted by Singapore and the USA. Singapore only provided guidance on the qualifying descriptors, whereas in the USA, the specific term 'cell-cultivated' was approved for two companies' cultivated chicken products. Since FSANZ's evaluation, a further cultivated meat product has been approved by an international regulator. The Israeli Ministry of Health, which approved Aleph Farm's cultivated beef steak in January 2024, has not yet released its assessment nor

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<sup>22</sup> Food Standards Australia New Zealand (FSANZ). Food Standards Code Legislation. 2023. [cited Feb 2024]. Available at: <https://www.foodstandards.gov.au/food-standards-code/legislation#about>

provided public advice on any required qualifying terms but refers to the product as Cattle-based Cultivated Meat in its media release<sup>23</sup>.

**Food Frontier fully supports the approach to label products made from cell-cultivated meat to ensure consumers are clearly informed about the nature of its production and agrees with FSANZ’s proposal to require a qualifying term for identification purposes in the statement of ingredients. We also agree that any term used in the qualification of an ingredient must match that used in a food name to avoid potential consumer confusion as well as to indicate the likely allergenicity of the ingredient.**

Food Frontier believes that labelling requirements will evolve over time and should be consumer-focused and research and industry led. There already exists capability and experience in this area. The Alternative Proteins Council (APC)<sup>24</sup> consulted widely with industry and relevant agencies to develop Meat Alternative and Dairy Alternative labelling guidelines to ensure consumer clarity and industry cohesion for alternative plant protein products in these categories.

CAA consulted widely with the industry to develop its Language Guide<sup>25</sup> to support consistent nomenclature for the cultivated meat category which resulted in a number of preferred and non-preferred terms, with the most preferred term “cultivated” emerging.

**Food Frontier recommends that at this early stage, FSANZ does not limit the allowable qualifier/modifier terms to a single term for labelling purposes. Although an excess of allowable terms may lead to consumer confusion, allowing the widely used terms, cell-cultured, cell-cultivated, cultured and cultivated to be used in conjunction with a format and utility term will allow consumers to be clearly informed how the product is made and the type of animal cell used to make it without restricting terms that are currently widely used in the sector.**

**Should FSANZ elect to mandate a single qualifying prefix term using the word ‘cell’, Food Frontier recommends this term should be ‘cell-cultivated’.**

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<sup>23</sup> Israel Ministry of Health. National Food Services. First in the World: the Ministry of Health Has Approved Cattle-Based Cultivated Meat. 17 January 2024. [Internet] [cited Feb 2024] Available from: <https://www.gov.il/en/departments/news/17012024-02>

<sup>24</sup> Alternative Proteins Council (APC). Meat Alternative labelling guidelines Oct 2022 and Dairy Alternative labelling guidelines April 2023. [internet] [cited 3 Feb 2024] Available from: <https://www.alternativeproteinscouncil.org/>

<sup>25</sup> Cellular Agriculture Australia (CAA). Language Guide V1.0. Nov 2023. [Internet] [cited 3 Feb 2024] Available from: <https://www.cellularagricultureaustralia.org/resources/key-terms>

## Other considerations

Enabling cost-effective food innovation in this nascent industry must be balanced with the paramount priority of ensuring consumer safety. Food Frontier recommends that ways to improve regulatory efficiency be examined by FSANZ in the future in order to drive investment and innovation in the sector.

Thank you for the opportunity to comment on A1269 Cultured Quail as a novel food ingredient.

Food Frontier supports the use of safe and approved novel foods using new technologies to provide new and innovative foods to grow our ability to produce protein sustainably.

### For more information, please contact:

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