

Submission on – Proposal P1041

Removal of Country of Origin Labelling Requirements

Submission by:

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Removal of Country of Origin Labelling Requirements from FSC

Proposal

FSANZ has assessed a proposal prepared to remove country of origin labelling (CoOL) requirements from the *Australia New Zealand Food Standards Code (FSC)*.

I BELIEVE THAT THIS SHOULD NOT HAPPEN.

This is in response to proposed new arrangements where the requirements will fall under Australian Consumer Law, and has prepared a draft food regulatory measure.

Comments on Proposal

The normal food manufacturer would look to FSANZ FSC to clearly define what is required, not the ACCC.

In contrast, the average consumers would talk to the ACCC not FSANZ on CoOL issues.

FSANZ defines every other aspect that is expected on a label, why not CoOL?

Comments on Current CoOL requirements.

The Current CoOL is calculated based on % of total cost* however the average consumer is misled by this and believes it is based on % of Australia ingredients present.

So a product that has 70% Australian cost* content could have only 30% Australian ingredients.....in itself inherently misleading!

This also makes it confusing for smaller manufacturers and nano-food businesses (with < 10 staff) who do not understand or even know where to find the current code.

Proposed CoOL.

A simple system for both consumers, manufacturers and nano-food businesses is.....

Labels must declare **both**:

- Where the product was made or packed. (but "Made in Australia" requires substantial transformation).
- % of Australian Ingredients (with a 12 month average permitted to account for ingredient seasonality)

E.G. **Packed** in Australia using **55%** Australian Ingredients(a seed & nut mix).

Made in Australia using **35%** Australian Ingredients.....(a protein ball).

Finally no front of pack Australian map, Aussie Flag, Kangaroo, Boomerang or other obvious Australian logos or device should be allowed without being able to clearly demonstrate that at least 50% of the costs* are Australian.

Closing remarks.

A clearer CoOL Standard makes it easier for consumers, nano-food businesses, manufacturers, enforcement agencies and other stakeholders to know exactly what is being claimed and if there is any misleading or deceptive claims that jurisdictions or the ACCC needs to investigate.

FSANZ Role is to clearly define food industry requirements. Jurisdictions and the ACCC's role is enforce them as required.

**Costs as defined in the "Food & Beverage Industry Country of Origin Guidelines to the Trade Practices Act"*