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FSANZ: Applications and Submissions - Submission

Monday, 29 August, 2011

- 1. Assessment Report Number:** P1011
- 2. Assessment Report Title:** Country of Origin Labelling – Unpackaged Meat Products
- 3. Organisation Name:** Department of Primary Industries Victoria
- 4. Organisation Type:** Government Agency
- 5. Representing:** Department of Primary Industries Victoria
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- 12. Submission Text:** P1011 – Country of Origin Labelling – Unpackaged Meat Products
Assessment Report Submission from Department of Primary Industries (DPI), Victoria
P1011 proposes amending the Food Standards Code to extend Country of Origin Labelling CoOL to unpackaged beef, sheep and chicken meat. The draft amendment was developed following a change in the Australian Government's Bovine spongiform encephalopathy (BSE) food safety policy that now permits the import of beef in limited circumstances. DPI notes that the regulation impact statement (RIS) accompanying the proposal found that extending the current Standard would not deliver any benefit over maintaining the status quo or developing a voluntary Code of Practice. DPI notes that there are existing market incentives for industry and retailers to promote product as Australian in response to consumer demand. The Victorian Government has committed to reducing business costs and unnecessary regulatory burden. Given the finding of the (RIS), the proposal is inconsistent with the Victorian Government's policy. For FSANZ to recommend the amendments in the proposal would also be inconsistent with the COAG Principles of Best Practice Regulation, which require a clear benefit to be established in order to introduce new regulation. In addition, DPI considers that the current CoOL labelling requirements for unpackaged pork, seafood and horticulture products are onerous and do not meet the minimum effective regulation test as they specify a minimum type size and require each unpackaged food to have a label. These requirements are also not consistent with the

COAG Principles of Best Practice Regulation as they go beyond the action that is proportional to the risk being addressed and they are prescriptive rather than outcomes based. Irrespective of whether mandatory CoOL is extended, DPI recommends that this element of the current standard be amended to reduce the requirements on small businesses, particularly butchers and greengrocers, while ensuring consumers receive the necessary information in a usable format. DPI recommends that the current CoOL Standard be amended to ensure that for all unpackaged food: • Labelling size is not specified and labelling is simply required to be legible. • A general display sign indicating all product on display is Australian unless otherwise labelled is permitted. This approach is consistent with COAG principles.

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