

About Northern Rivers Food

Northern Rivers Food (NRF) is a regionally based food Industry group made up of members in the food industry from the paddock to the plate. We are based in Northern Rivers of NSW. We have approximately 100 members including both small and large food manufacturers.

Country of Origin Labelling

Pam Brook as Chair of Northern Rivers Food has attended all Country Origin workshops that were offered to Industry in our region of Northern NSW.

Our overall concern is that while the concept of Country of Origin labelling is an excellent initiative and clear Country of Origin labelling is needed, the current proposals discriminate against small and medium Australian businesses.

Small Business Discrimination & Public Health Issues

Food Labelling rules should apply to all products that are covered by food labelling rules under current legislation.

The main area of concern that we have, is the fact that snack foods (including chips but not nuts), confectionary, soft drinks (but not juice), bottled water and alcohol will be exempt.

I understand this decision has been made on the basis that consumers are less interested in the COOL of these products (based on the Colmar Brunton consumer research). The government should apply laws uniformly, not just what one survey shows is a perceived trend at the time.

This makes a mockery of consistent and uniform food labelling and is hard to see as anything other than a cave in to the large food manufacturers.

This has the potential to make healthy fresh foods less competitive against snack products, which could only be described as a perverse outcome. It is potentially a disaster from a public health perspective.

It is also incredibly inequitable to small and medium businesses as there is a significant cost associated with changing labels.

Seasonal Ingredients

In the COO presentation this slide specifically addresses what they call “seasonal ingredients” where products that may have to use imported products from time to time can use an “at least” or “average” claim that should allow some variation in country of origin of ingredients without having to change a label.

The percentage of ingredients is easy to apply for some manufacturers but can be very difficult for other manufacturers – to change packaging rapidly is not a reality. Most producers will order packaging in large volumes to get the best cost management and cannot change their packaging two or more times a year.

Many NRF producers use the Australian Made logo on their packaging for domestic and export markets but the % bar proposed in this legislation would be confusing in export markets and our members would have to develop a different package for export markets. This creates an impost on Australian producers.

Governance and Inspection

Currently inspection of packaging to ascertain compliance with food labelling rules is virtually non-existent. Our members report either no inspections ever occurring to only one in fifteen years.

How is the government planning to implement a far more complex set of rules when it currently doesn't inspect and verify if a product meets the Made in Australia standards in the current food laws?

NRF believe the Government need to implement inspection of the current Country of Origin rules.

Imported Goods

Imported goods do not have to comply with this legislation. Any food labelling legislation should apply to imported and Australian goods. This is the case in every other country that I am aware of - to do other than this is discriminatory to Australian manufacturers.

The Australian Government is very keen to publically distance themselves from any possibility that this initiative is seen as a non-tariff barrier to imports out of fear of the WTO and is framing this solely in terms of providing clarity to consumers and this is making them a little cautious.

Practicality of pack sizes

Currently on all pack labels we have to indicate

- Nutrition information
- Ingredients
- Allergens

The font size of these COO recommendations will be difficult to implement on small packages.

Addressing Food Safety Issues vs COOL

Our understanding is that the reason we are seeing changes made to COOL is due to a contamination issue regarding berries sourced from China. This issue is one of food safety, not country of origin.

For instance, Hepatitis A is generally not tested when products are coming into the country. This means we potentially could have the same issue with food products coming from any country, including Australia.

It is the responsibility of the manufacturer of the ingredient, the importer, and the producer of the finished product to ensure that their food chain is safe and clean.

The message coming from the Government is that imported food is bad just because it comes from overseas. We have missed an opportunity to educate producers and consumers on safe food practice. Instead we have a knee jerk reaction that will do nothing to fix the problem if it occurred again.

A mandatory test for Hep A on imported food would make more sense, rather than targeting a side issue that has taken the limelight from the actual problem.

Northern Rivers Food Recommendations

The Government develops revised Country of Origin laws that apply to ALL food currently subject to Australian Food Labelling laws and comply with our WTO obligations - this includes imported food and also relates to current small pack size regulations.

The Government implements policing of its existing food labelling guidelines.

