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## **SUBMISSION TO THE REVIEW OF COUNTRY OF ORIGIN LABELLING POLICY**

### **Disclosure**

I am a Dietitian and Health Economist with formal qualifications also in public policy and governance. I am currently completing a PhD at Monash in health service systems using dietitians as a case study.

My work history includes public and private sector health services, food industry (for-profit) sector as well as government and not-for-profit contracts. Across these sectors, I have worked in direct patient care, information and communication technology, marketing, academic roles including consultant and advisory roles.

The content of this submission is in my professional capacity, acknowledging my part representation via Monash, but do not imply Monash shares nor supports my view.

### **My position on Country of Origin Labelling**

I make this submission, the content, in its entirety, with due consideration given to the challenges on consumer, industry and government sides.

Information on the origin of each ingredient, in all food products on Australian supermarket shelves, presented in a true and meaningful way, is absolutely in line with the core purpose of food labelling. Viewed, at best, a mandatory minimum standard, at worst, a reasonable request by consumers of industry; industry would do well to meet.

Either way, Country of Origin Labelling (CoOL) must happen.

How we get there is secondary.

## Background

There is a mismatch between what consumers are asking and what the proposal for comment is answering. This does not diminish the positive contribution the proposal presents. The reason for acknowledging the mismatch is to build on the proposal, and to maximise this opportunity for comment.

The question consumers want to know is:

*1. What country do the ingredients in this food come from?*

The question the proposal answers is:

*2. How Australian are the ingredients in this food?*

My submission prioritises a “how to answer” the first question, and supports the proposal on the table to answer the second. I offer a single addition to the current legislation The Code 1.2.4 Labelling of Ingredients, to answer question 1.

I have previously written publicly on the topic of Country of Origin Labelling, which I include the links to here as part of my submission for consideration.

Voevodin M. For safety’s sake, make food labels say what companies already know. The Conversation February 2015 [<https://theconversation.com/for-safety-sake-make-food-labels-say-what-companies-already-know-37752>]

Voevodin M. Governments proposed country-of-origin labels leave you to guess where your food comes from. The Conversation July 2015 [<https://theconversation.com/governments-proposed-country-of-origin-labels-leave-you-to-guess-where-your-food-comes-from-44973>]

## Introduction

We are in a global food system. Within this system, Australia is recognised as having a consistent high quality food supply as well as capacity to grow enough food to feed its population. Because of this, Australia is in the envied position of potential economic growth and stability in exporting “Australian” food products.

The move toward a more global food system has occurred in the background so-to-speak. For the most part, food industry have made changes to procurement of ingredients and supply chain efficiencies driven by quarterly targets and market share metrics. It is now time for these behind the scenes piecemeal changes and transitions to be reported on the label to answer: where does this food come from?

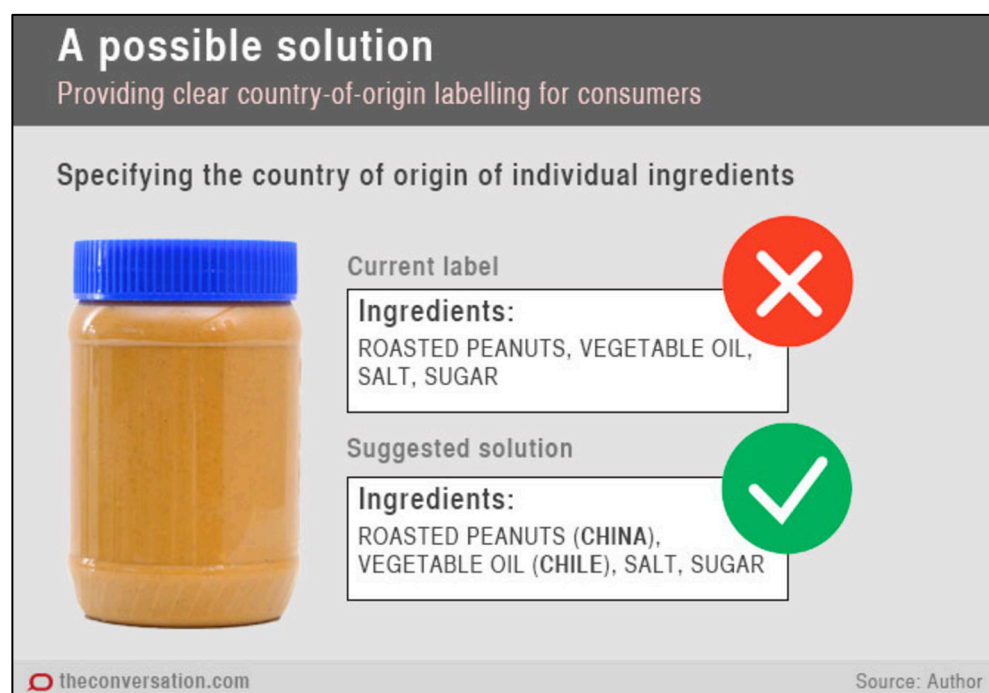
The principles to frame my recommendations and statements of support in this submission are:

- I support profit, economic growth, and consumer choice in the principles of the “free market”, but not at the expense of informed [consumer] consent, nor public health
- A “free market” requires “perfect information”: industry to give correct, true, clear and sufficient information to satiate individual consumers’ ability to make an informed decision (consent) to choose a particular product, and the capacity to readily compare one product over another
- It is not up to industry, nor governments, to speculate on and decide what information achieves absolute consumer satisfaction
- It is not up to industry, nor governments, to speculate on what and how the information requested by consumers is used to make decisions
- Industry, Australian industry particularly, could have [self] led CoOL, however, given [implied] apprehension in declaring origin of ingredients, consumer’s request of government to now make country of origin labelling mandatory is more than reasonable
- If there is continued apprehension from industry in committing to CoOL, I recommend industry review their procurement and supply-chain practices to achieve a more palatable repertoire of ingredient sources
- The role of government is to legislate, to be transparent and simple in the line of complaint to reprimand, and the reprimand includes a disincentive for recidivism
- A consumer education campaign should not be necessary as the labelling recommendations here should be unambiguous, clear, and the truth
- Jurisdictional body to acknowledge the “trust” consumers place in industry to consistently “tell the truth”
- The role of government is to legislate in a manner where incentives to procure ingredients sourced locally is prioritised
- The role of government is to legislate in a manner where incentives to promote Australian owned and local businesses are prioritised

## Q1. What country do the ingredients in this food come from?

### Recommend

1. Initial focus and commitment to label “origin of ingredients”
2. “Origin” meaning where the ingredient was “grown” [Consistent with definition of “grown” in consultation draft Nov 2015 8(1) pg 9]
3. Leverage current requirement for ingredient labelling [1.2.4 Labelling of Ingredients] in its entirety with the following addition:
  - a. Use the [universally recognised 3-Letter code](#) for a country to appear in brackets after each ingredient (Figure 1)
  - b. For items with five or fewer ingredients, all five ingredients must include the country the ingredient was “grown”, in brackets after each ingredient
  - c. For items with six or more ingredients, the first five ingredients must include the country the ingredient was “grown”, in brackets after each ingredient [remaining ingredients CoO optional]



**Figure 1:** Country of Origin Labelling for each ingredient in a food product

An example of CoOL where the country the ingredient is “grown in” is included in the ingredient list  
source: <https://theconversation.com/for-safetys-sake-make-food-labels-say-what-companies-already-know-37752>

## **Q2. How Australian are the ingredients in this food?**

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### **Recommend:**

4. Support CoOL to come entirely under The Code (FSANZ)
5. Potential to “dump” the inclusion of where the physical packaging is made (ie the jar, the box, the wrapping)
6. Continue to explore “processed in” and labelling of such processes
7. Support “in principle” on pack labels to reflect the Australian-ness of a product, if this is what consumers want
8. Investigate whether answering Q1 What country do the ingredients in this food come from? in the manner proposed in this submission is sufficient to satiate consumer desire for information on CoOL