

29th January 2016

Aussie Farmers Direct submission to Country of Origin labelling taskforce

Introduction

Aussie Farmers Direct is grateful for the opportunity to make a submission regarding Australia's proposed new Country of Origin Labelling (CoOL). Aussie Farmers Direct has previously raised concerns about the opaque and confusing nature of Australia's current labelling regime.

As a proud supporter of Australian farmers, growers and producers, we believe that a food or grocery line should comprise at least 90 per cent Australian ingredients to be called an "Australian" product.

While we note that the proposed new labelling laws do not adopt this position, we believe they represent a significant step forward in giving Australians greater clarity about where their food comes from.

In this submission, we put forward our position on some of the key proposed initiatives that the CoOL Taskforce has issued for consultation, namely:

- **Section 9 – Non-priority foods**
- **Section 19 - Proposed labels**
- **Section 29 – Transitional provisions**
- **Use/display of CoOL on retail websites**

We are providing feedback on these areas as we believe they are of particular interest to our customers, and/or have a direct bearing on our business operations.

Aussie Farmers Direct – Company Background

Aussie Farmers Direct has been delivering Australian made and grown food from the farm-gate straight to the front door of over 100,000 Australians for the past ten years. We and our customers are passionate about supporting Australian farming, food production and manufacturing. We recently won the inaugural Canstar Blue award for Most Satisfied Customers (Online Groceries, Fresh Food). Aussie Farmers Direct is a unique business that puts purpose before profit, supports fair farm-gate prices, and pairs old-fashioned values with a modern, convenient way of shopping.

Submission responses:

We support the proposed rules regarding the use of "grown in", "produce of" or "made in Australia from Australian ingredients" claims.

Section 9 – Non priority foods

Aussie Farmers Direct does not support the creation of a subset of “non-priority foods” that will be able to use a less rigorous form of CoOL. We believe creating such a category risks adding complexity and customer confusion when the new labelling rolls out.

Section 19 – Proposed labels

We note the CoOL taskforce is seeking views on how best to label food that is made in Australia, where some or all of the significant ingredients are not Australian. The two options proposed are for either a quartile percentage scale, or a scale in 10 per cent increments.

At Aussie Farmers Direct, the vast majority of the products we sell are made with at least 95 per cent Australian ingredients. As a result, we support a 10 per cent scale to disclose Australian content, as we believe this gives a more accurate picture of product composition.

We understand that under the proposed decile scale, products will be rounded down to the nearest 10 per cent, ie, a product that contains between 91 to 99 percent Australian ingredients will be labelled as “over 90 percent”.

Given the vast majority of our packaged grocery lines contain well over 95 per cent Australian ingredients, Aussie Farmers Direct will consider giving customers more detailed information about Australian content levels, either on pack or via our website.

Section 29 – Transitional provisions

Aussie Farmers Direct supports the proposed 24 month timeframe to transition to the new labelling regime. However, we will be endeavouring to meet the new labelling requirements sooner than this.

Use/display of CoOL on retail websites

Aussie Farmers Direct is a 100 per cent eCommerce business. While the primary focus of the new labelling requirements relates to their display on packaging at the physical point of sale, we do believe eCommerce retailers should be displaying the appropriate product labelling on their sites so customers are fully informed prior to purchase.

In the case of Aussie Farmers Direct, we have created an easily accessible “product information” page for every product we sell. We believe this page is the most appropriate area to display CoOL information, as our customers are familiar with viewing this section for additional product details, such as nutrition information. Examples of these product information screens follow:



General Info
Nutritional Info

A2 Milk Light 2lt
\$5.49

Add to Order +

Nutritional Info	Avg. Qty Per Serving	Avg. Qty Per 100g
Energy	473kj	189kj
Fat - Saturated	2.3g	0.9g
Fat - Total	3.3g	1.3g
Protein	7.7g	3.1g
Sodium	120mg	48mg
Calcium	293mg	117mg

*Disclaimer: Aussie Farmers Direct aims to include in the product list up to date pictures of the products and accurate ingredients, nutritional information and other information. However, product detail may change from time to time and there may be a delay in making updates. We recommend that you read the label on the products you purchase or



General Info
Nutritional Info

Clever Cooks Pasta Bake 400g
\$8.99

Add to Order +

Clever Cooks homestyle Pasta Bake is a classic recipe made from the finest quality Australian durum wheat penne pasta and a beautifully rich 100% Aussie beef bolognaise all tossed together and topped with a creamy béchamel sauce and tasty cheddar cheese. Our hearty classic

Béchamel Sauce (42%) [Water, Cream (Cream (Milk), Mineral Salts (450, 500), Stabiliser (400)), Cheddar Cheese (6%) (Milk, Salt, Cultures, Non Animal Rennet, Tapioca Starch, Preservative (200)), Thickener (1442), Milk Solids, Onion, Salt, Chicken Stock Powder, Cheese Solids (Milk)], Bolognaise Sauce (36%) [Tomato (35%) (Dice (Food Acid (Citric Acid))), Paste], Beef Mince (27%), Water, Vegetables (Onion, Carrot, Celery), Wine, Canola Oil, Thickener (1442), Beef Stock Powder (Soy), Salt, Garlic, Sugar, Herbs, Spices, Onion Powder, Worcestershire Powder], Penne Pasta (20%) [Pasta (Durum Wheat Semolina), Water, Canola Oil], Cheese (2%) (Milk).

ALLERGEN ADVICE, CONTAINS MILK, EGG, SOY AND GLUTEN

We would not support any requirement to display CoOL labelling on homepage product tiles (see following link for example page: <https://shop.aussiefarmers.com.au/shop>). Incorporating CoOL on these pages would require a significant and costly re-build of our eCommerce site, and the added graphics would significantly diminish site performance and the overall user experience.

Further information if required:

Aussie Farmers Direct is happy to further discuss or clarify any aspect of this submission.

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