

27 January 2016

Country of Origin Labelling – Submission

Rizo Desserts is very concerned about the implications and cost to our business if the proposed mandatory Country of Origin Labelling is approved.

We provide small cup dairy and jelly portion desserts to hospitals. You can imagine the pressure on us to keep costs to a minimum. Our labels are an easy peel lift off lid which have constrained space issues. There is no possible way we can fit the proposed symbols as well as everything else that is required on labels in this space. Printing or using outer-packaging would be cost prohibitive to the clients as well as making it more difficult for their patients to open their food. And even if hospitals would agree to the extra packaging and extra costs this SME would not be able to afford to put in the capital to re-work our machines. Especially when it will not produce any increased sales for the business (and actually take away from our very small margins).

If you go ahead with compulsory labelling of these large symbols our labels would become unreadable. Something which the Department of Health is trying to avoid so that labels can be legible to their mostly over 70 patient base (mind you I am a lot younger than that and I also need glasses to read labels!). FSANZ already has minimum font sizes which are almost impossible to achieve when you have all the ingredients, nutritional panels, company details, sizes, product names, storage details etc to adhere to. You may think that we just have to have bigger packaging but think through the supply chain. Label manufacturers get their machines to cut to standard sizes of cups etc. Filling machines are made to those same international standard sizes. You just cannot say – oh please make my label bigger! It won't go through my label maker machines or my machines. If this is made mandatory I will just have to squeeze it on to the label but something will have to give. Is it that I make everything smaller (and then not meet minimum FSANZ rules), or make barcodes smaller (and not meet GS1 requirements), or do I just make the name of the product so small that no-one can really read it anyway? Or do I delete my logo – tiny as it is – which is my only marketing opportunity.

Although we only use Australian ingredients we still think this scheme is not the answer to what the Australian consumer wants. The issue is around where the food is from. This scheme only addresses how much is from Australia. It still doesn't tell me where the other portion is from.

We think this is a political stunt designed to make the Australian public think the Government is doing something. When in reality they still won't get full clarity on the origin of their food. The Government, to try and score a large launch and press conference, is placing unfair pressure on Australian manufacturers. And again, for what? I as a consumer still won't know where my frozen peas come from!

The increased costs for the proposed Country of Origin Labelling scheme will be detrimental to our business and sales and will not be able to be borne by our public hospital customers.

Printing on cups is too expensive and won't be able to be done here and will require us to go off-shore to find solutions.

So as a Business Owner and a Consumer I am against this scheme. It came about in response to anger about contaminated overseas product and at a time that the Government needed to be seen to be achieving something. It has been hurried and it shows in that it completely fails to meet the brief from the consumer. That is, where is my food from?

It should not be mandatory.

Regards