

Country of Origin Labelling – Submission

To whom it concerns,

Diseb Food group - Da Vinci is concerned about the implications and cost to our business if the proposed mandatory Country of Origin Labelling is approved.

We have approximately 60 sku's, based on the Federal Government estimate of \$6,245 cost of new packaging per sku, our investment on packaging alone will be 375,000 (sku's x \$6,245). This cost of \$6,250 per sku is a reasonable approximation. I would expect costs will be considerably higher than this \$6,250.

Implementing this scheme with new packaging and compliance be at considerable cost resulting in loss of business, deletion of product lines and reduced employment.

Our products are 99% Australian ingredients other than some herbs and spices which we cannot buy in Australia and therefore the proposed changes will mean that we are NOT given the fair chance of communicating this to the consumer.

The increased costs for the proposed Country of Origin Labelling scheme will not be accepted by our retailers, and will have to be absorbed by our business through other means, eg deletion of lines, reducing employment.

Diseb Food group - Da Vinci does not support the mandatory Country of Origin Labelling proposal in its current proposed form.

We would support this if there was a better formula/structure for us, and in our case when such a small ingredient is imported purely because its not available in Australia.

Under the current proposal we would need to use the 75% Australian logo, which would unfairly assist others who may have up to 25% of imported ingredients. I would also suggest that many would look to increasing the imported content to reduce manufacturing costs and in its current form, they would still abide by the proposed new law.

I urge the Government to really think about this point, as I believe it would in fact hurt the economy more than doing good.

The theory and what the aim is, is most likely a good thing but it is essential that in some way you can capture the almost 100% made products and only not 100% because it cannot be purchased as Australian made.

Should you have any queries or require any further information please do not hesitate to contact me.