

29th January 2016

Consultation Hub - Country of Origin Labelling
Department of Industry, Innovation and Science
Australian Government

Re Submission on the CoOL Proposals

INTRODUCTION

The submission is from the Technical Committee of the Food Technology Association of Australia (FTAA). FTAA is a company based organisation representing small, medium and large food manufacturers. Ten members attended the briefing session in Melbourne and the FTAA Technical Committee met thereafter to consider the proposals.

We would like to note that the timing of this feedback process , considering the enormity of the proposals is totally inadequate due to the time of the year. We believe the proposals were released on the 4th December and it is common knowledge that the industry is still going flat out with supply before a period when all levels of staff take holiday. The Committee did not have time to review the Research but question whether the interpretation was really supported by the Research. There were a total of 1220 participants, 19% were from Melbourne = 232 and of these 27% plus 7% found current labelling difficult or very difficult to read (ie 79 persons) we would respectfully suggest that an education programme might be more appropriate.

OVERVIEW

The proposal as is extremely confusing, has many grey areas , does not provide measurable descriptions necessary for compliance (eg significant, , prominent, virtual). Figures for label changes for printed labels have been quoted as \$6000 per SKU (NB without any administration, technical, marketing costs added) were considered accurate by a medium size company estimating A\$2.4million for its 400SKUs and by a small company with 40 SKUs. Furthermore – in general there is no benefit to a Company spending this amount. We also appreciate that the improvements are required as proven by the many studies over the years and would recommend the following : -

1. Review the current kangaroo programme and close the loopholes and make it tighter
2. Add percentage of imported ingredients to the text on labels (eg made from Local and 24% imported ingredients – or Made from 76% local plus imported ingredients)
3. An education programme should be introduced to say that imported food into Australia is strictly controlled and that Countries should not be taken as an indication of Quality.
4. Any changes can then be surveyed again after 2 years to make sure the objectives have been met.

COMMENTS ON QUESTIONS ASKED.

It is apparent that the decision has been made to remove CoOL labelling from the Food Standards Code and add to Consumer law under the ACCC.

Whilst we do not agree with the current proposal as above we believe the following comments may be useful as feedback on certain issues and in the development of a new Standard.

The comments below are as requested in The Country of Origin Labelling Consultation Package – Item 3 and follow the numbering in that section.

Part 1

Section 8

- a. It will be necessary to establish specific definitions of generalised classifications for any code to be effective eg significant, virtual, multiple origins. They should be measurable and not left to interpretation – maybe in figures.
- b. Do not agree with non priority foods – should be all or nothing or voluntary.
- c. Should be all or nothing

Section 9

- a. As above

Section 12

- a. Final weight should be used – as it is with Nutritional information and ingredient labelling.
- b. Yes – will be different for most processed food involved in cooking, heating or baking (is loss of water).
- c. Yes

Section 13

- a. Ensure that the calculation and handling of this issue is clear.

Division 3

- a. The definition of key is firstly unacceptable as it left to interpretation so would need to be defined – maybe more than 50% (and going back to the introduction this could be fitted into the current ingredient statement) Furthermore ,unless the figure set is high (eg 40% or 50%) then again there is insufficient space on the label. Many ingredients are imported and individually may come from 2 or 3 countries alone. Not a practical idea.

Section 18

- a. Yes
- b. Yes - do not agree with the need for any bar chart.
- c. Yes – but need to be more specific as there may be 6 to 10 ingredients in this list.



Section 19

- a.If mandatory then 10%
- b.OK (see b above)
- c.NO Comment – this is just MORE information.

Section 20.

- a.Averages based on previous 24months OR based on last 12 months PLUS best estimate of next 12 months (updated each 24 months).
- b.As at present Seasonal averages could be covered by statement that values are seasonal and average(tolerance of +/- 20%).

Section 21(6)

- a.No - too confusing for companies let alone Consumers.

Section 26

- a.No
 - b. No do not agree with either logo or bar chart.
 - c. No do not agree with either logo or bar chart.
 - d. No do not agree with either logo or bar chart.
- Please Note – labels are already very full with information required by law (could be the reason for them being difficult to read). Any further NON essential information could make this worse.

Section 29

- a.Financial impact is catastrophic at \$6000 per SKU and thus unacceptable.
- b. Recommend alternative system as follows
 - a. Include % of Australian ingredients in ingredient declaration as OVERVIEW above
 - b. Review and tighten the current Kangaroo system/programme
 - c. Implement a consumer education programme for the 33%

Dictionary

- a. This is a critical part of any successful food law and need a lot more work to avoid vague outputs. FTAA willing to participate in such work.

End of Comments

Best Regards

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