SENATE STANDING COMMITTEE ON COMMUNITY AFFAIRS

LEGISLATION COMMITTEE

Food Standards Amendment (Truth in Labelling - Palm Oil) Bill 2010

SUBMISSION

SUBMISSION NUMBER: 450

SUBMITTER

Geoffrey Bryant

Submission to the Senate Community Affairs Committee Inquiry into the *Food Standards Amendment (Truth in Labelling – Palm Oil) Bill 2010*

16 November 2010

Dear Senators

I wish to make a submission to the inquiry into the *Food Standards Amendment (Truth in Labelling – Palm Oil) Bill 2010.*

Generally, I am supportive of the Bill, in that it will require more transparent disclosure by manufacturers of the type of vegetable oil used in food products. This will facilitate consumer choice, both in terms of a product's nutritional as well as environmental values. As other submissions have noted, the increasing use of palm oil poses particular challenges for consumers and has placed additional pressure on the natural environments of Indonesia, Malaysia and other producing countries.

I noted the submission from Woolworths Ltd, in which attention was drawn to the practical compliance difficulties posed by the Bill in its present form. I agree that the adoption of a 5% threshold for the palm oil content of compound ingredients, in accordance with the current *FSANZ Standard 1.2.4 Labelling of Ingredients*, would be an appropriate commercially-minded amendment to the Bill as currently drafted.

I would further advocate for the inclusion in the Bill of a ban in Australia on food products which incorporated palm oil which did not meet the Roundtable on Sustainable Palm Oil (RSPO) standards of sustainability. In a small way, this would discourage further palm oil-related deforestation in a number of countries and may ultimately lead to the reforestation of sensitive areas in Indonesia and Malaysia. It would also demonstrate some moral leadership on this issue by Australia, which may in turn assist in raising the profile of this regionally significant environmental challenge. While the suggestion may seem draconian, in most cases there are readily available substitutes for palm oil which could minimise any potential reduction in food choices for Australian consumers.

The adoption by the Bill of RSPO sustainability standards presents interesting issues for the Community Affairs Committee and for Parliament. Firstly, the Committee will need to consider how any future food labelling requirements would be affected by any changes in the RSPO's standards of sustainability. Additionally, it is crucial the Committee and Parliament informs itself in an continuing manner about the RSPO's certification assurance and audit practices, in case the apparent certainty they offer proves illusory.

Thank you for the opportunity to make a submission on this important issue.

Yours faithfully

Geoffrey Bryant
Brisbane, Qld