To:
Prime Minister
Minister for Health and Aging. January 2012.

Re: Food Labelling Laws Inadequate.

As a consumer I wish to know in detail, with all purchases, which country my food (vegetable or meat) is:
- grown,
-processed, and or
-packaged.
in relation to the major component(s) of the packaged product. Currently the standards, regulations and laws are too weak and I am unable to know where the product originated.

What I want.
Food labelling standards updated in the section relating to country of origin - grown, processed and packaged, replacing any words OPTIONAL with MANDATORY DISCLOSURE.

Detail:
The Labor Prime Minister Mr Whitlam introduced consumer protection in 1973 with the view to empowering the public through consumer rights, information and protection. Today, I ask our Labor Prime Minister to once again step in and protect the consumer by ensuring food labelling laws ALWAYS identify the above three components on the pack Country that grew the food, country that processed the food and country that packaged the food. Each one of these country's can be different. Today the consumer has no access to information to know.

I wrote to the Prime Minister on 14 March 2011 regarding labelling laws and Kathy Dennis, Assistant Secretary – Research, Regulation and Food responded to my request for improved labelling laws on 4 April 2011 (Dept Health and Aging). She replied and the key part of the letter states: "Under the country of origin labelling requirements packaged food must carry a statement identifying the country where the food was produced, made or packaged". But then goes on to explain "Although the wording of the Standard allows for identification of all source countries and allows percentages to be indicated, this **approach is optional only and it is up to manufacturers to choose whether or not they include this information on their labels**."

Clearly the wording "OPTIONAL " must be replaced with the wording "mandatory" within the food standards and regulations for packaged goods, requiring both manufactures and retailers to declare where the product is grown, processed and packaged. The fact that the retailer or manufacturer may source product from several locations/ countries is their problem. As a consumer, my problem is having the information to make an informed decision as to whether I buy the product. I cannot make an informed choice today. The retailers use the weak regulation to deceive consumers through non disclosure of specific detail (i.e. country of growth). They meet the minimum regulatory standard and focus consumer choice on price alone. Price then becomes the only decision point left to consumers , thus becoming a self for-filling justification for the retailers to use against enhanced labelling standards. Australian manufactures are then pushed out of the market place.

The intense competition between our Duopoly retailers Woolworths and Coles has focused on price solely, leaving country of origin out of the equation, to the detriment of Australian food producers and manufactures. The evidence is clear in the number of Australian food manufacturers who have closed down and /or off shored their operations or sold their "brand" to overseas corporations who then manufacture and source the cheapest product simply to stay on the shelf of Woolworths or Coles. For any manufacturer to complain to Government about unfair practice would quickly result in having their product removed from Woolworths or Coles shelves, no reason is required for Woolworths or Coles to do so – they can and do hold manufactures to ransom. There is no other retail competitor for the manufacturer to turn to for sales of their product because of the strong Duopoly. Thus no complaints to Government. Manufactures and farmers are at the mercy of the big two retailers in

Australia. **Poor labelling laws place Australia's food security at high risk of failure,** simply because Australian's cannot choose to support Australian grown or produced food because of inadequate labelling laws.

A recent example to prove my case. Woolworths have been refitting their stores nationally. Reduced Frozen Food shelf space has resulted in Woolworths reducing the Frozen Food range. My example focuses on one product, frozen onion. Woolworths deleted all brands of frozen onion – other than its own Woolworths Brand. In January 2012, the Woolworths frozen onion band food label read: "PACKED IN AUSTRALIAN FROM IMPORTED INGREDIENTS". There was no other information about where the onion was grown, not even Woolworths could tell me when I rang their "buyer" and asked for the country of origin. I asked Woolworths to provide me with a choice of Australian grown or generic brand. On this occasion Woolworths have reintroduced one brand on my request – Birds Eye which still uses Australian grown onions and is processed and packed in Australia. I will pay the extra – I just need to be given the information and option. I don't expect Woolworths to retain the product for long however. The profit margin received from Birdseye is lower than from Woolworths own brand product.

Another recent example: Woolworths Fruit and Vegetable department advertised Avocado's as Product of Australia and New Zealand on the shelf. None of the fruit was individually labelled and therefore was impossible to determine where the produce actually came from. I refused to purchase the product. The store manager was powerless to answer my question "which country" nor could he change the marketing as "it was supplied from head office".

Conflict of Interest.
I note in the Assistant Secretary's letter to me that she references the joint Australian New Zealand Food Standards review. I would argue that involving New Zealand in Australia's labelling standards is a competitive dis-advantage to Australian Manufactures and that New Zealand has an interest in ensuring labelling remains unclear so as not to disadvantage their growing food manufacturing base. The Australian Government is responsible for Australia's food security, not New Zealand interests.

What I want.
1. Food labelling standards updated in the section relating to country of origin - grown, processed and packaged, replacing any word OPTIONAL with MANDATORY DISCLOSURE.

2. Detail should be printed on the package in font equal to or greater than 10 pitch Arial style as a minimum. Alternative styles and sizes are optional, but cannot be less than the standard. There is currently appears to be no print size stated in the standard (that I could find).

3. Importers and retailers must disclose in detail these three things: country grown, country processed and country packaged in relation to each primary product within the container. Only one country in relation to one product is permitted. For example: A packet of Ham (contains 90% Ham). The primary product is Ham, thus: Grown in Canada, Processed in New Zealand and packaged in Australia.

4. Government should expect retailers to protest, arguing that to maintain supply; they must source fruit or vegetables from a variety of countries. Labelling laws will add expense because of new packaging and tracking requirements. I would argue, therefore, that Australian producers and manufactures are currently at a disadvantage and unfairly discriminated against because they must disclose, yet imports are not required to. This is unjust to Australian producers. The standards must provide the consumer with information on where the product was grown, processed and packaged without exception, it's the retailer/ manufacturers obligation to disclose where product is grown/produced, etc. If manufacturer chooses to import, this is a cost they bare, because Australian manufactures already bare this cost. Its time for an equal playing field.

5. As the Government, you have a responsibility for ensuring that Australian growers and food manufactures are supported over imported product, to ensure our future food security. Once manufacturing knowledge and technology is lost from Australia – it cannot easily be regained.

In closing an observation: Australia grows the cleanest vegetables in the globe, yet the majority of frozen vegetables retailed in freezers today are imported from undisclosed countries. The cause: poor labelling laws. Prove me wrong.

Regards : Greg Wolfe