

Friends of the Earth Australia

Request to amend

Food Standards Australia New Zealand (Truth in labelling laws) Bill 2009

to include the compulsory labelling of palm oil

1. Introduction

Friends of the Earth Australia request amendments to the *Food Standards Australia New Zealand Act 1991* (the Act) to ensure adherence to section 2A item (c) which covers the provision of adequate information and labelling relating to food ingredients to enable consumers to make informed choices. Specifically, we request the compulsory labelling of palm oil and palm oil derivatives on the ingredients panel of food and grocery products.

Palm Oil is a vegetable oil ingredient that is commonly used in many processed food and grocery products. Under the current interpretation of the FSANZ Act, there is no requirement to accurately label palm oil as an ingredient in food products. In most cases the term vegetable oil is used to describe the ingredient palm oil.

2. Why amend the FSANZ Act to request the compulsory labelling of palm oil?

Currently the FSANZ Act fails to fulfil its obligation to adequately inform consumers about the exact ingredients that make up food products, thus denying them the 'right to know' what food ingredients they are consuming. Specifically the labelling of some ingredients, in this case the accurate reporting of palm oil is not compulsory and is often labelled as vegetable oil. Consumers wishing to select or avoid products that contain palm oil, for allergy, health or other reasons are unable to make these choices as the FSANZ Act does not require the compulsory accurate labelling of this specific ingredient.

The current practices commonly used to produce and process palm oil result in many detrimental environmental and social problems. By requesting the compulsory labelling of palm oil, consumers will be given the information to make an informed choice to buy or avoid products that contain palm oil, thus upholding the 'right to know' aspect of the FSANZ Act. Additionally, compulsory labelling will be a driver for food manufacturers to support existing palm oil procurement schemes that seek to minimise environmental and social harm in the production and processing of palm oil. They will be encouraged to switch to more sustainable oil inputs as a result of

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pressure and demand from well informed consumers who can now detect if a product contains palm oil.

A summary of just some of the major detrimental environmental and social problems associated with current palm oil production are outlined below. These give the background as to why a consumer may wish to know if palm oil is in a food product so they can either a) avoid the food product; b) request that the food manufacturer changes their palm oil procurement to support palm oil production schemes that result in less environmental and social damaging. Examples of less damaging palm oil production schemes include certified palm oil (CSPO) from the Round Table on Sustainable Palm Oil (RSPO) which can be facilitated through the purchase of Green Palm certificates.

1. Unsustainable land management practices used to clear land for oil palm plantations. These practices result in the large scale logging, clearing and burning of high conservation value forest.
2. Land clearing is destroying the last remaining natural habitat areas for species listed as endangered and threatened. These include the Queen Alexandra birdwing butterfly, the Asian elephant, Borneo and Sumatran orangutans, the Sumatran rhinoceros and the clouded leopard.
3. Land clearing, burning and the drainage of land rich in peat material is releasing large volumes of methane and carbon dioxide gas. These greenhouse gases are responsible for dangerous human induced climate change.
4. In the allocation of licences for oil palm cultivation, traditional land titles are often ignored and local indigenous populations are on occasion forcibly removed from their land or not adequately compensated for the sale or displacement from their land which is sold to oil palm plantation developers for palm oil production.
5. Oil palm developments create opportunities for some population groups, whilst stripping away livelihoods and rights of others. This division creates tension, social conflict and violence between normally peaceful local communities.
6. Palm oil plantations and processing facilities that do not adhere to stringent best practice and environmental laws are responsible for the use of dangerous pesticides that pollute waterways and pose risk to the health of workers. Oily waste and effluent from oil palm processing facilities pollutes water ways and depletes stocks of aquatic life, thus impacting on water and food sources of local populations.
7. Palm oil is extremely high in saturated fat and the Australian Heart Foundation recommends that the consumption of oils high in saturated fat should be minimised.

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Various campaigns promoting the compulsory labelling of palm oil and requesting for the use of certified sustainable palm oil have measured a strong consumer demand for information relating to the presence of palm oil in food products. This demand is measured through the submission of over 3,000 signatures on petitions requesting the labelling of palm oil in food products and over 34,000 signatures supporting mandatory palm oil labelling in just the month of the Melbourne Zoo's 'Don't Palm Us Off' campaign in Victoria. These figures are complimented by hundreds of emails, phone calls and letters received from consumers wanting know which products contain palm oil as an ingredient.

**3. Proposed amendment to the Food Standards
Australia New Zealand (Truth in labelling laws) Bill
2009**

We propose that the compulsory labelling of palm oil and palm oil derivatives, including and palm kernel oil should be introduced into the proposed *Food Standards Amendment (Truth in Labelling Laws) Act 2009*. This amendment applies specifically to 'Standard 1.2.4 – Labelling of Ingredients' The words 'palm oil', should appear in the ingredients list where palm oil or a palm oil derived product is used.

Friends of the Earth Australia welcomes the introduction of the Food Standards Australia New Zealand (Truth in labelling laws) Bill 2009 and trusts that the proposed amendments to request the compulsory labelling of palm oil in ingredients lists is considered.



Yours sincerely

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