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Committee Secretary
Select Committee on Australia's Food Processing Sector
PO Box 6100
Parliament House
CANBERRA ACT 2600

Dear Committee Secretary

In relation to the terms of reference for the Select Committee on Australia's Food Processing Sector, the South Australian Farmers Federation (SAFF) wishes to make comments on (iii) food labelling.

There is a growing trend for consumers to expect concise food labelling. There is a need for consumers to be able to make a clear choice between what is 100% Australian grown/sourced and what is not.

SAFF believes strongly that the basic reason for food labelling is to provide the consumer with a clear and simple method of identifying the product they are purchasing and the country of origin of that product. The principle behind any food labelling must be based on total integrity.

Food labelling must allow the consumer to have a choice in what they decide to buy, by providing clear and accurate information regarding the origin of the contents that the customer will consume.

Current labelling laws have made it difficult for consumers to accurately understand what it is they are buying and where it comes from. It could be said that current food labelling practices make it intentionally confusing for consumers to make an informed choice.

SAFF believe that the KISS principal should be applied to food labelling.

1. The label accurately describes the content of the package that the customer will consume.
2. The label clearly identifies the product in the package as 100% Australian Grown/Sourced.
3. The size of the printing and position is easy to find and read.
4. All other confusing labels such as:
 - a. company is Australian owned;
 - b. made in Australia;
 - c. made in Australia from local and imported products; and
 - d. packaged in Australiashould be removed altogether.

This needs to be embedded in a much tighter legislative environment than currently exists.

Presently, complex and confusing Country of Origin Labelling (COOL) laws make it difficult for consumers to recognise local product from subsidised imports as they allow loopholes for processed food products to be labelled as “Australian” when they are not. The following is required:

1. A more efficient enforcement system than currently operates in Australia in order to ensure compliance with our suggested changes.
2. To remove labels other than 100% Australian Grown/Sourced product.
3. To mandate the use of the label “Product of Australia” to mean 100% Australian Grown/Sourced.
4. To ensure integrity, an accreditation or auditing system would need to be put in place to support these claims.

It is essential that there is clear country of origin labelling for **all** food products before any permission to import into Australia is allowed.

As part of this extension, there is the need to ensure that there is accurate country of origin labelling.

For example, it should not be necessary for the Australian pork industry to have to heavily promote the Australian PorkMark label so that consumers can identify products made from Australian pork. Currently it is estimated that *70% of Australia's processed pork products (ham, bacon and smallgoods) are produced from imported pork and are allowed to be labelled as made in Australia.*

The labelling requirements should be such that Australian food products can be readily identified from imported food products, regardless of where any processing may have taken place.

It is also essential that the actual country of origin is clearly indicated. In particular, there are allegations that food products coming from New Zealand have initially been sourced from other countries. As part of the process of allowing food products into Australia, third country access must be addressed, or else these products should not be allowed in.

Yours sincerely



Carol Vincent
CHIEF EXECUTIVE