

The Chair  
Senate Economics Committee  
The Australian Senate  
Parliament House  
Canberra, ACT



23<sup>rd</sup> October 2009

Dear Sir,

Riverina Citrus is pleased to offer the following submission to the Inquiry into the Food Standards Amendment (Truth in Labelling Laws) Bill 2009.

Riverina Citrus represents over 500 citrus growers from the City of Griffith and the Shires of Leeton, Carrathool and Murrumbidgee NSW. It is founded under the NSW Agricultural Industry Services Act 2001. The Riverina is the largest citrus growing region in Australia and produces over 30% of the nation's crop. Its growers produce is destined for domestic, export and processing markets. As a consequence of its water security and innovative agricultural practices, the Riverina is recognised as producing the highest quality produce with consistent grades.

Riverina Citrus would like to make the following points in reference to the proposed Bill.

- The proposed Bill has merit given the confusion and lack of transparency with the current regulations.
- Improved labeling empowers consumers.
- Criticisms of the Bill based on the cost and technical challenges of changes Labels is not credible. Current labeling technology and practices easily accommodate rapid and frequent changes to labels. With the technology in use today, there is minimal if any additional costs associated with changes to labels.
- Frequent label changes (such as Use by Dates) are a standard feature of all food packaging industries.
- Consumers are interested in their source and content of their food.
- There is no evidence to support the argument that Truth in Labelling legislation will force processors to source a greater share of their supply from offshore.



- Riverina Citrus is not opposed to imports. We have an extensive record of exporting fresh and processed produce. It is our belief consumers ask for choice and the ability to make informed decisions. Australian farmers are required to meet high standards of hygiene and environmental and safeguards. These same standards are not always obvious with imported ingredients. Indeed some consumers make decisions based on Human Rights relative to Australia.
- Truth in labeling legislation may encourage more consistent and efficient production if processors encourage farmers to meet year round supply. This is more likely to reduce shortfalls and greater efficiency for producers.
- National Foods submission in relation to the percentage of imported juice highlights the need for greater transparency rather than lack of information. By requiring an accurate percentage of imported juice, processors and suppliers would be required to operate on a level playing field. This would benefit farmers, importers, processors and consumers. We are not aware of any other industry that justifies a lack of information on the basis of competitive advantage. It is not credible that processors would be purchasing ingredients of unknown or variable content. As explained above, current technology is well able to accommodate rapid alterations in detail (eg Use by Date).
- Truth in Labeling legislation will not imperil trade liberalisation. No country will object to transparency. It is not a trade barrier and may assist some importers if they know they are competing in a consistent regulatory environment.
- The Coles submission is somewhat contradictory. They argue CoOL has minimal impact on buyer behavior then suggest changes to Made in Australia labels will cause significant job losses. In practice greater truth in labeling will empower consumers and support Australian farmers and processing jobs.

Riverina Citrus does not have a view on the size of labeling and there appears to be merit in some of the submissions the size of the font may distort the visual impact of the labels.

We commend the intent of the Bill and welcome the opportunity to assist the Committee with its enquiry.

Yours Faithfully,

**Scot MacDonald**  
Executive Officer