

## Comments on Food Labelling Bill

The proposed drafting of this Bill displays ignorance of the existing Commonwealth and State and Territory food and consumer protection laws, the legislation that applies in New Zealand and does not consider the costs.

This Bill seems to be proposing amendments which would be in conflict with how the food regulatory system in Australia and New Zealand currently works. There are existing labelling requirements within the Australia New Zealand Food Standards Code for country of origin and for legibility. These were agreed to by 10 jurisdictions following public consultations. Surely these provisions would have to be reviewed rather than attempting to alter the FSANZ Act, which is about the operation of the statutory body. There are Commonwealth and State/Territory food acts and legislation in New Zealand that would have to be considered for such an amendment.

Secondly the provisions relating to use of the word Australian are not exclusive to Food, so amending a food related act would create an anomalous situation. The use of the word "Australian" would impact on the existing requirements for terms in current use such as "Product of Australia", "Made in Australia from imported and local ingredients", and "Packed in Australia".

The Bill will effectively destroy the ACCC provisions for country of origin labelling as it will no longer be possible to use the word "Australia" other than in relation to Product of Australia. How will this affect the many products that are manufactured in Australia but include a percentage of imported ingredients? What statement would be required to indicate if the product is locally manufactured and employs Australians, using seasonally available ingredients from Australia and importing ingredients when these are not available?

15 mm and 25 mm (1 inch) type sizes are very big, and conflict with the Australia New Zealand Food Standards Code which uses outcome-based regulation to require that the statement is legible. The current minimum of 3 mm is required for warning statements which are justified on public health and safety grounds and small packages can use 1.5 mm.

Long words such as "concentrate", "imported" and "Australian" will not fit on many current packages of fruit juice and fruit drink using this font size.

These provisions seem to relate to just orange juice. It is not practical to peel many fruits for juicing, particularly with berries and many of the Australian native fruits which are gaining popularity. Imported concentrates are not available for many fruits anyway.

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