

16 August 2011

Stephen Boyd
Committee Secretary
House of Representatives Economics Committee
PO Box 6100
Parliament House
Canberra ACT 2600

By email: economics.reps@aph.gov.au

Dear Mr Boyd

Re: Inquiry into the *Food Standards Amendment (Truth in Labelling – Palm Oil) Bill 2011*

Woolworths welcomes the opportunity to comment on the *Food Standards Amendment (Truth in Labelling – Palm Oil) Bill 2011*.

Woolworths previously provided a submission to the Senate Inquiry into the Bill which I understand the House Economics Committee will be considering during the course of your Inquiry.

Woolworths supports the Bill and particularly welcomes the use of the Roundtable on Sustainable Palm Oil (RSPO) standard for sustainable produce. Woolworths is committed to continually developing product labelling for our customers and is an active participant in the Labelling Review Response consultations flowing from COAG's *Labelling Logic: Review of Food Labelling Law and Policy (2011)*.

At Woolworths, we are committed to the sustainable use of palm oil and providing our customers with meaningful information about its use in our products. On 3rd September 2010 Woolworths became the first Australian retailer to join the RSPO. Additionally, over the past four years we have worked to reduce the content of palm oil in our Private Label products and implemented a plan to expressly label palm oil where it is a major ingredient in those lines, with a number of our products now displaying this new labelling. Woolworths also announced that it would be transitioning to the use of RSPO certified palm oil in our Private Label products by 2015.

As noted in our previous submission, while Woolworths supports the Bill and its policy objectives, we are concerned about the workability of the provision in relation to labelling trace elements of palm oil. Woolworths proposes an amendment to require food manufacturers to include palm oil as an ingredient where it constitutes more than 5 per cent of the weight of the final product. This would be consistent with FSANZ *Standard 1.2.4 Labelling of Ingredients* which requires food manufacturers and processors to label the sub-ingredients of a compound ingredient where that compound ingredient constitutes more than 5 per cent (in weight) of total ingredients in the final food product.

Should you require further information please do not hesitate to contact Cassandra Simpson, Public Policy Manager, on (02) 8885 9133 or at csimpson@woolworths.com.au.

Yours sincerely,

A handwritten signature in black ink that reads "N Samia". The signature is written in a cursive, flowing style.

Nathalie Samia
Group Manager – Government Relations and Industry Affairs
Woolworths Limited