

SUBMISSION NO. 7



CONSUMERS' ASSOCIATION OF SOUTH AUSTRALIA INC.

Member of Consumers' Federation of Australia Inc.

Patron: Anne Levy

Secretary, Anthony Moore

PO Box 3265 Rundle Mall, Adelaide SA 5000

Telephone: (08) 8227 1648

Email – mail@consumerssa.org.au

Webpage – www.ConsumersSA.org.au

Kevin Bodel
Inquiry Secretary
Joint Standing Committee on Treaties
Parliament House
Canberra ACT 2600

Dear Sir

**SUBMISSION TO JOINT STANDING COMMITTEE ON
TREATIES CONSULTATION THE WORLD WINE
TRADEGROUP (WWTG) AGREEMENT ON REQUIREMENTS
FOR WINE LABELLING**

Consumer Association of South Australia Inc

Consumers' SA (CSA), established in 1977, is the peak consumer protection body in South Australia. CSA represents South Australian consumers' interests by encouraging the dissemination of information on issues affecting consumers, providing a forum for discussion and presenting a South Australian consumer perspective to all levels of government. CSA receives national recognition through membership of the Consumers' Federation of Australia. CSA is non-profit making and non-political

The contact person is:

John Furbank

Mob.

email:

In 2003 Australia, as a member of the World Wine Trade Group (WWTG) agreed in principle that, for wine bottles, four common mandatory items - Product Designation, Content Volume, Percentage Alcohol and Country of Origin - could appear on a label or labels that are in a single field of vision. It is understood that this agreement was not ratified by the Federal Parliament at the time and now the subject of an enquiry by the Joint Standing Committee on Treaties.

Accordingly, Consumers SA wish to make this submission as part of the consultation by the Joint Standing Committee on the proposed ratification of the WWTG Agreement on Requirements for Wine Labelling.

The National Trade Measurement Regulations is extremely important for consumers because of its beneficial effects on consumer protection, consumer decision making, and business competition. These in turn contribute to the achievement of a more competitive, efficient and dynamic economy.

The ratification of the WWTG Agreement on Wine Labelling involves amending the Trade Measurement Regulations to allow for the volume statement to appear in a place other than the principal display panel of a wine bottle as is currently required, thus failing to provide consumers with important product information that is needed to make an informed choice.

Information about the quantity of product in a container or other package is extremely important to consumers in determining value for money and making informed choices.

Current legislation requires net weight or measure of an article in a container to be shown prominently so that it is in an easily visible and read location on all containers.

The Agreement allows wine producers individually to decide whether or not to place the quantity information on the front or rear label if the container is one of the standard fill sizes specified in the Agreement. Therefore information on quantity will be shown in different locations according only to the producer's preference.

All other containers will have to show the quantity on the front label. This will result in the quantity information being on the front of some and the rear of other containers even within the wine industry.

There is a large variety of package sizes offered by different companies and they can introduce new innovative bottle shapes with different volumes. This has happened with a number of food products where the quantity has been reduced to avoid increasing the price per item which would be above a particular company selling price point.

CSA believes that wine should at minimum have similar labelling requirements as other food and beverage products. Removing the requirement to have the volume on the principle display panel is inconsistent with existing labelling requirement for foods and non-alcoholic beverages. Granting exemptions to the wine industry is likely to have flow on effects to other food and beverage products with other segments of the industry seeking exemption.

Currently the wine industry does not have difficulty meeting the specific labelling requirements of importing countries and CSA does not see this as sufficient reason for the industry be exempt in this way.

John Furbank
for Anthony Moore
Secretary, Consumers SA

Cc Robert Oakeshott MP Member for Lyne
Gail Gago MP Minister for Consumer Affairs SA