



AUSTRALIAN  
FOOD AND GROCERY  
COUNCIL

4 February 2004

Senator Susan Knowles, Chair  
Senate Standing Committee on Community Affairs  
Truth in Food Labelling  
Parliament House  
CANBERRA ACT 2600  
Email: [community.affairs.sen@aph.gov.au](mailto:community.affairs.sen@aph.gov.au)

Dear Senator Knowles

**Re: Inquiry into Truth in Food Labelling Bill 2003**

The Australian Food and Grocery Council (AFGC), strongly **supports** the regulatory regime established through the Office of the Gene Technology Regulator and Food Standards Australia New Zealand (FSANZ) which are based on sound scientific principles of risk assessment for the protection of public health and safety.

The aim of such regulations is the primacy of protecting public health and safety and the environment, and at the same time fostering a climate conducive to innovation and independent commercial decisions.

The AFGC believes that the existing regulations provide confidence in the regulatory safeguards governing the development, release and labelling of products made using gene technology.

AFGC policy with respect to biotechnology is that labelling requirements should be based on risk associated with the product and not the biotechnology that produced it.

The AFGC **does not support** the “Truth in Food Labelling Bill 2003” proposed by Senator Brown as it is not based on sound science and evidence of risk to public health and safety.

“Nature identical” components derived from GM have no basis in science for being labelled as to their source. Animals consuming approved GM modified feed, produce “nature identical” products and there is no basis in science for being labelled as different to other animals.

Country of Origin Labelling (CoOL) provisions mentioned in the “Truth in Food Labelling Bill 2003” have been the subject of policy development by the Food Regulation Standing Committee and decision by the Australia and New Zealand Food Regulation Ministerial Council in December 2003. The Ministerial Council agreed to mandatory country of origin labelling of food. Ministers emphasised that this was not a public health and safety issue, as the safety of the food supply is assured through other means.

The AFGC **disagreed** with this decision recommending a voluntary provision because:

- CoOL is not a public health and safety issue;
- country of origin information is available from alternative sources; and
- there is no evidence of market failure with the existing voluntary provisions.

Australia's food industry has long recognised the critical importance of the use of new technologies, such as biotechnology, in the production of food and beverage products and ingredients.

In its broadest definition, biotechnology is any technique which uses living organisms to make products, to improve plants or animals or to develop microbes for specific uses. Humans have been using biotechnology for thousands of years — to bake bread, brew beer and make cheese.

Gene technology, developed following 40 years of research into the genetic code of living things, is an extension of earlier biotechnologies. It is a precision breeding tool used to select desirable characteristics to improve plants and animals for more efficient, sustainable and diverse food production delivering improvements to consumers and the environment.

Gene technology is fundamental to providing new and improved consumer products as well as ensuring the profitability and growth of companies and nations worldwide. Indeed, there is little debate that technological innovation is considered a central growth factor for any economy, and that it is key to long term business success.

Gene technology offers the prospect of innovations that may address the challenges of:

- managing the environment;
- sustainable food;
- feeding the worlds population; and
- increased consumer demands for tailored food products and services with greater nutritional value and health benefits.

Consumer confidence in the safety and integrity of products derived from the application of new gene technologies is fundamental to investment in its development and the commercialisation of its products.

The AFGC believes consumer confidence is provided by the public processes of the Office of the Gene Technology Regulator before products are approved for use in Australia and by those of FSANZ during the development of Food Standards.

Yours faithfully



Dick Wells  
Chief Executive