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SUBMISSION TO FOOD STANDARDS AUSTRALIA

Proposal P1041 – Removal of Country of Origin Labelling Requirements

1. About AUSVEG

AUSVEG is the National Peak Industry Body representing the interests of Australian vegetable and potato growers. We represent growers around Australia and assist them by ensuring the National Vegetable Levy and the National Potato Levy are invested in research and development (R&D) that best meets the needs of the industry.

AUSVEG also makes representations on behalf of vegetable and potato growers to ensure their interests and concerns are effectively communicated to all levels of government, in the public sphere, and throughout relevant areas of the private sector.

2. Queries

[Redacted text block]

Yours sincerely

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Richard J Mulcahy
Chief Executive Officer

AUSVEG has long been an advocate for strong, effective reform to Australia's Country of Origin Labelling ("CoOL") system. We have welcomed the Australian Government's commitment towards reform in this key area of consumer information, and their ongoing dedication to consultation with industry.

Considering the nature of the Government's reforms in this area, and in particular their focus on regulating CoOL with an Information Standard, AUSVEG considers it an eminently logical course of action to move responsibility for CoOL entirely away from Food Standards Australia New Zealand ("FSANZ") and wholly into the Australian Consumer Law ("ACL").

A major part of AUSVEG's support for CoOL reform is the right of consumers to make informed purchasing decisions about their food, and with the safe harbour claims allowable under the current labelling system already falling under the jurisdiction of the ACL, AUSVEG believes it is a common-sense move to transfer other CoOL requirements to the ACL. In particular, this will allow for civil enforcement actions to be taken against food manufacturers who do not comply with labelling requirements.

While we note that the call for submissions on this Proposal states that "[s]ubmissions on the two ACL transition options are out of scope for this call for submissions", and specifies that "[s]ubmissions on the timing of the revocation of CoOL from the Code are within scope of this call for submissions", it is difficult to comment on the latter point without referring to the former.

We would therefore like to take this opportunity to make brief comment on the transitional period covering the revocation of CoOL from the *Australia New Zealand Food Standards Code* ("the Code") and the implementation of CoOL under the ACL. We hope to see this transition cover as short a time period as is possible and feasible for food manufacturing businesses, to ensure that consumers are able to benefit from the strengthened protections under the finalised reforms introduced by the Government.

Finally, we would like to note our appreciation for the chance to make a submission on this Proposal, and to express our gratitude for the work FSANZ has performed during the period in which country of origin labelling requirements have been their responsibility. It is vital that Australian consumers can have faith in the safety of their food purchases, and with CoOL often being used as a proxy for food safety by many consumers, the work performed by FSANZ enforcing the Code has been a valuable aspect of Australia's food safety systems.