

4 March 2016

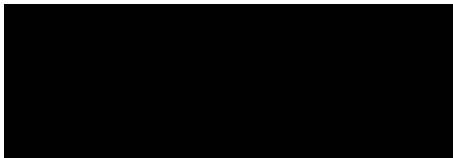
Project Manager
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for submissions – Proposal P1041: Removal of Country of Origin Labelling Requirements.***

Yours sincerely



Katherine Rich
Chief Executive

Food Standards Australia New Zealand
CALL FOR SUBMISSIONS – PROPOSAL P1041: REMOVAL OF
COUNTRY OF ORIGIN LABELLING REQUIREMENTS

Date 2016

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to comment on the ***Call for submissions – Proposal P: Removal of Country of Origin Labelling Requirements***.

New Zealand Food & Grocery Council

NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

Comments

NZFGC supports removal of Country of Origin Labelling requirements from the Australia New Zealand Food Standards Code. While Standard 1.2.11 does not apply in New Zealand, it might have been mistaken as being applicable by those not familiar with the placement of the ‘Australia only’ statement and its removal avoids any confusion.

We understand there are particular timing issues that need to be observed by Australia and believe other submitters to be raising these with you.

We are concerned that the *Agreement between the Government of Australia and the Government of New Zealand concerning a joint Food Standards System* in Article 3 states that the Agreement “shall apply to the development of the Australia New Zealand Food Standards System” and that the scope of the system set out in clause 2 of Article 3 includes any information about food including labelling, promotion and advertising. Since country of origin labelling for food is part of the food labelling regime, it seems anachronous that the Australian Government can go outside the Food Standards System to develop labelling specifically for food in this area unless with the agreement of the other party to the Agreement, the New Zealand Government. This concern potentially opens the way for departures in other areas.